-		١
f	T	1
ſ	O	
ı	3	
1	2	
١	m	
٦	=	1
	<u></u>	•

	_
	D
	7
?	8
	3
,	3
	5
,	3
	['
•	

	•
Cove	
er Page -	(
- Requir	- 100 CO. C.

Page 1 - Cover Page		86#:		BET#:	Training Attendance Record Form 7/1/2011
	632-859-1680.		rect (via the portal) or fi	Submit an electronic copy to $\underline{HRDirect}$ (via the portal) or fax a copy to $\underline{HRDirect}$ at	
		ata entry:	Special Instructions for data entry:	Renewal Date: 2014 S	Does this training require renewal? ⊠Y ☐ N
7/1/03	Surmick	02073357		Shorman	10. Strohl, Stephanie S
10/2/90	Surmick	02073329	mell	All of	9. O'Donnell,Patti
11/4/96	Surmick	02073270 .	190	2 Solar	8. Neiswender, Gary S
9/17/01	Surmick	02073323	Meur	(Takuia a)	7. Medir, Patricia A
5/14/12	Surmick	20039247	2	. Host Ha	6. Kennedy,Patrick
2/19/13	Surmick	20046815	20/	New Mire	5. Kemmerer, Andrew
7/29/09	Surmick	20012329		H >>	4. Jarosh,Jonathan P
1/31/00	Surmick	02073298			3. Dule, Daniel
9/22/03	Surmick	02073361	fully	malene (2. Cully,Marlene
1/15/03	Surmick	02073344	the state of the s	Collecte	1. Berdanier,Richard
Hire Date	Supervisor	Global (Employee) ID (Required)	Globai (Requ	Signature Signature	PARTICIPANTS Print Full Legal Name (as it appears on paycheck)
SHE & Quality Strategic Mgmt.	☐ Personal Dev. ☒☐ Sales / Mktg. ☐	☐ Languages ☐ Leadership	☐ HR & Legal ☐ IT / Computer	☐ Engineering / Equipment ☐ General Business Admin.	☐ Chemical / Product Training ☐ Communication / Presentations
٠			(5))	(employee) to #(s) if melike employee(s)) ck one)	Please categorize this training: (Check one)
☐ Virtual	Delivery: X Classroom	Method of Delivery:			Instructor(s): Gary Neiswender
(if known)	per		(Chargeback cost to participant)		
Trainer's Transp. Cost:	Trainer's	Vendor Invoic Material Cost	ion:		Henkel Contact:
	(Vendor address / location if known)	(Vendor address		(Name of training company)	
					Provider: ⊠ Henkel □ Vendor
QA	Business Unit: (☐ Off-site	West Hazleton	Location: Menkel facility Wes
ours: 0.5	11:30am Total hours:	End Time(s): 1:	10:30am	Start Time(s):	Date(s): 4/5/2013
(If applicable)				(Please use the same title each time this class is delivered)	(Please use the same title
	CEUs:			nonization System	Course Title: HazCom/Global Harmonization System
			•	*	(

Henkel

Training Attendance Record

Hackment (

Course Title: HazCom/Global Harmonization System

Date(s):

4/5/2013

(Please use the same title each time this class is delivered)

Start Time(s): 10:30am

11:30am

Total hours: 0.5

End Time(s):

CEUs: (If applicable)

				20.
				19.
				18.
				17.
				16.
				15.
				14.
				13.
				12.
				11.
				10.
				9.
1	٠, ا			8.
				7.
				6.
				S,
			0	4.
9/29/03	Surmick	02073366	K. K. H. cho to	3.Webster,Linda R
3/2/88	Surmick	02073199	Whi Th	2.Thomas,Mary E
3/25/96	Hartlage	02073257	and the first	1.Surmick,Janine M
Hire Date	Supervisor	Global (Employee) ID (Required)	Signature	PARTICIPANTS Print Full Legal Name (as it appears on paycheck)

1	$\overline{}$
1	0
1	3
1	谷
١	ک

	-
	4
	エ
	0
1	2
-	2
1	3
1	6
1	3
1	+
1	,

Cover Page - Required.

Page 1 - Cover Page	7-000.	BE#:	8ET#:	Training Attendance Record Form 7/1/2011
	2-859-1680	al) or fax a copy to HRD/rect at 63	Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680	Submi
		s for data entry:	Renewal Date: _2015 Special Instructions for data entry:	Does this training require renewal? ⊠Y □ N Renewal
7/1/03	Surmick	02073357	- SCOLOGO N	and the second second
10/2/90	Surmick	02073329	Hote i Unall	10. Strohl Stephanie S
11/4/96	Surmick	02073270	O'X Tolans	9. O'Donnell Patti
9/17/01	Surmick	02073323	That who all here	8. Neiswender Gan/S
5/14/12	Surmick	20039247	Work Kan	7 Macir Datricia A
2/19/13	Surmick	20046815	Crown hommon	Kennedy Detrick
7/29/09	Surnick	20012329	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	T Vonnous Andrews
1/31/00	Surmick	02073298		4 Jaroch Jonathan B
9/22/03	Surmick	02073361	marken Curren	3 Drile Daniel
1/15/03	Surmick	02073344	SHEP Land	2. Cully Marlene
Hire Date	Supervisor	Global (Employee) ID (Required)	Signature	Print Full Legal Name (as it appears on paycheck) 1. Berdanier, Richard
☑ SHE & Quality ☐ Strategic Nigmt.	☐ Personal Dev. ☐ Sales / Mktg.	gal 🔲 Languages nputer 🔲 Leadership	Engineering / Equipment	Communication / Presentations G
	est.		(a)	categorize this tra
☐ Virtual	incurrence in Delivery: \(\times \) Classroom		(Indude Global (employee) ID #(s) If Henkel employee(s)	(Indude Global (employee
	per person	Method		Instructor(s): Gary Neiswender
sp. Cost:	Trans	Material Cost	ring training) (Chargeback cost to participant)	(Name of Henkel person organizing training)
Trainer's		Vendor Invoice /	Tultion:	Henkel Contact:
	(Vendor address / location if known)	(Vendor address	(Name of training company)	(Nar
		ă.		Provider: Menkel Vendor
S .	Business Unit:		ton	Location: Menkel facility West Hazleton
hours: 0,5	10:30 Total hours:	End Time(s):	Start Time(s): 10:00	1/13/14
176	CEUS		ne this class is delivered)	
	- 1		ion System	Course Title: HazCom/Global Harmonization System
Cover Page - Required.	Q	STILL FOR THE STATE OF THE STAT	Ġ.	•

Henkel

Training Attendance Record

Use if additional pages are needed.

Course Title: HazCom/Global Harmonization System

Date(s): 1/13/14 (Please use the same title each time this class is delivered)

Start Time(s): 10:00

End Time(s): 10:30

CEUs:

Total hours: 0.5

(If applicable)

PARTICIPANTS Print Full Legal Name (as it appears on paychack)	Signature	Global (Employee) ID	Supervisor	Limo
1.Surmick,Janine M	The Charles of the Ch	(Required)		ulle Date
2.Thomas,Mary E	THE STANSON OF THE ST	02073257	Hardage	3/25/96
3 Webster Linds	The Vier	02073199	Surnick	3/2/88
O TO TO THE OWNER OF THE OWNER OF THE OWNER OWNE	TO VA	02073366 .	Smill	
4.			outunick	9/29/03
ST.				
6.				
7				
œ				
9.	/#			
10.				
11.				
1				
13.				
14,				
15.				
16.				
17.				
18.				
19			,	
20				

1	Ŀ	-	
ŧ	Œ	7	I
1	3	_	Į
ŀ	6		Į
•	(~/	

	D
	王
77 n.	a
7	achr
-	3
:	Me
	13
÷.	7
	4

Cover Page - Required

Course: Title: Hazard Communication Date(s): Provider Please categorize this training: (Check one) Does this training require renewal? ☐ Y 🛛 N Henkel Contact:... Jarosh, Jonathan 2. Dule, Daniel 8,-Fred Ney 6. Mecir, Patricia A Kemmerer, Andrew Esposito, Joseph 1. Berdanier, Richard **PARTICIPANTS** 9. O'Donell, Patti 7. Neiswender, Gary S 11. Strohl, Stephanie Ringleben, Mary Print Full Legal Name (as it appears on paycheck) Chemical / Product Training Communication / Presentations 5/2/15 ⊠ Henkel ☑ Henkel facility (Please use the same title each time this class is delivered) X (Name of Henkel person organizing training) (Include Globai (employee) ID #(s) if Henkel employee(s)) ☐ Vendor Hazleton ☐ Engineering / Equipment☐ General Business Admin. (Name of training company) Renewal Date: Signature Smolle start Time(s) D mins (Chargeback cost to participant) Tutton Special Instructions for data entry: ☐ Off-site 10:00 am 1000 HR & Legal .
IT / Computer K Global (Employee) ID Required) End Ime(s) 10:30 am 02073344 02073298 20046815 20012329 02073357 02073329 02073270 02073323 2008634 Vendor Invoice/ Material Cost 225164 305410 ☐ Languages☐ Leadership (Vendor address / location - if known) (Indicate if total or per person cost)
Method: of Delivery.

Signature: Signature of the person cost) Supervisor Janine Surmick Janine Surmick Janine Surmick ...Dan...Dule Sales / Mktg. Dan Dule Dan Dule Personal Dev Dan Dule Dan Dule Dan Dule Dan Dule Dan Dule Business Unit: QA CEUs Total hours 0.5 Trainers Transp. Cost. (If applicable) Hire Date SHE & Quality Strategic Mgmt. 9/17/2001 2/19/2013 1/15/2003 11/4/1996 7/29/2009 1/31/2000 10/2/1990 3/4/2014 11/1/1999 9/7/2006 7/1/2003 ☐ Virtual (If known) 2

Training Attendance

Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680.

1 - Cover Page

Use if additional pages are need

(Please use the same title each time this class is delivered)
Start Time(s):

(If applicable)

(Employee) ID Supervisor (red) Dan Dule 02073257 Dan Dule 066502 Dan Dule 20089721 Dan Dule

Thirdka.

2431899

7/11

Form Approved. OMB No. 2050-0039

	M HAZARDOUS	m m m man man man man a man a ma		Page 1 of 3. En	(877)		4. Manifest	1942		20 1	FLE
	E MANIFEST or's Name and Mailin	PAD987271012 g Address		1. Gener	ator's Site Addres				200		
	CORPORATION NAME OF THE	te Tony Smetz Nazelton pa 18201		125	. CORPORATI JAYCEE DR HAZLETON PA		70) 455-998	9x105			
enerator's Transport	s Phone:		5 690-4		meter on the	10177 10	U.S. EPA ID	A A			
		SYS (TRANS GROUP) I	LLC			*	PAD98	126613	81		
Transport	rter 2 Company Nam			The state of the			U.S. EPA ID	Number			
	ted Facility Name and	100 111					U.S. EPA ID	Mumbar			
REPUB 2869	BLIC ENV SYS SANDSTONE DR	(PA) LLC [VE)85690	1500		
		s PA 19449 (215) 622-8995 on (including Proper Shipping Name, Hazard C	lass ID Number		10. Cont	ainers	11. Total	12. Unit	1		
	nd Packing Group (if a		nass, ib ivamber,		No.	Туре	Quantity	Wt./Vol.	- 1;	3. Waste Co	des
7	direz za auste 1 800utt e reti	TEANNABLE LIQUIDS, CORROSIV DRE, COLORBIOCH 1 2 192 POTT	E , X.O.S. (X ROTDOGE)	ETHYL-		-OM		124	P404-	9002	-8022
		FLANKARLE LIGHTOS, W.O.S. () DNE) 3 PGII RQ(DOGI)	CHLOROFORK,	NETHYL	2	DM	800	P	F003	0022	F003
^	AUDUSTAL MESS	THE REPORT OF THE PARTY.		try o _e .	4 00	7.1					1
3.	NON DOT/REA	A REGULATED WATERIAL, N.O.S.	2.50		1	TP	1500	p			
4					+	-	-				
			1.125			a E ig		1		1 0	
4.1	EKATOK SJOFFERO	R'S CERTIFICATION: I hereby declare that the	he contents of this of	consignment are ful	ly and accurately	described above	ve by the proper s	hipping nam	e, and are o	lassified, pa	ckaged,
marke Expor	ed and labeled/placa orter, I certify that the dify that the waste min	rded, and are in all respects in proper condition contents of this consignment conform to the teal imization statement identified in 40 CFR 262.2	n for transport accor	rding to applicable i EPA Acknowledgm quantity generator	nternational and n ent of Consent.) or (b) (if I am a s	ational govern	mental regulation	hipping nam s. If export s	hipment and	I am the Pr	imary
marke Expor	ed and labeled/placa	rded, and are in all respects in proper condition contents of this consignment conform to the tea imization statement identified in 40 CFR 262.2 ped Name	n for transport accor	rding to applicable i EPA Acknowledgm	nternational and n ent of Consent.) or (b) (if I am a s	ational govern	mental regulation	hipping nam s. If export s	hipment and	I am the Pr	ckaged, imary
marke Expor I certin Generator's	ed and labeled/placa orter, I certify that the dify that the waste min	rded, and are in all respects in proper condition contents of this consignment conform to the ten imization statement identified in 40 CFR 262.2 ped Name	n for transport accor	rding to applicable i EPA Acknowledgm quantity generator	nternational and nent of Consent.) or (b) (if I am a s	ational govern	mental regulation	hipping nam s. If export s	hipment and	I am the Pr	imary
marke Expor I certif Generator's 16. Internal Transporte	ed and labeled/placa viter, I certify that the lify that the waste min s/Offecor's Printed/Ty attional Shipments er signature (for expo porter Acknowledgmer	rded, and are in all respects in proper condition contents of this consignment conform to the ten imization statement identified in 40 CFR 262.2 ped Name Import to U.S. arts only): It of Receipt of Materials	n for transport accor	rding to applicable i EPA Acknowledgm quantity generator Signature	nternational and nent of Consent. or (b) (if I am a s Port of Date le	mall quantity g	mental regulation enerator) is true.	hipping nam s. If export s	hipment and	I am the Pr	ay Year
Generator's 16. Internal Transporte	ed and labeled/placa viter, I certify that the lify that the waste min s/Officer's Printed/Ty stional Shipments er signature (for expo	rded, and are in all respects in proper condition contents of this consignment conform to the ter imization statement identified in 40 CFR 262.2 ped Name Import to U.S. arts only): It of Receipt of Materials me	n for transport accor rms of the attached 27(a) (if I am a large	rding to applicable in EPA Acknowledgm quantity generator Signature	nternational and nent of Consent. or (b) (if I am a s Port of Date le	mall quantity g	mental regulation enerator) is true.	hipping nam s. If export s	hipment and	I am the Pr	ay Year
Generator's 16. Internal Transporte 17. Transporter	ed and labeled/placa viter, I certify that the lify that the waste min s/Offecor's Printed/Ty attional Shipments er signature (for expo porter Acknowledgmer	rded, and are in all respects in proper condition contents of this consignment conform to the ter imization statement identified in 40 CFR 262.2 ped Name Import to U.S. arts only): Internal conformation of the term of	n for transport accor rms of the attached 27(a) (if I am a large	rding to applicable i EPA Acknowledgm quantity generator Signature	Port of Date le	mall quantity greentry/exit:	mental regulation enerator) is true.	hipping nam	hipment and	I am the Pr	ay Year
marke Expor I certification of the control of the c	red and labeled/placa riter, I certify that the iffy that the waste min iffy that the waste min iffy that the waste min iffy the control of the control of iffy the c	rded, and are in all respects in proper condition contents of this consignment conform to the ter imization statement identified in 40 CFR 262.2 ped Name Import to U.S. arts only): at of Receipt of Materials The Keith Legice The Materials	n for transport accor	rding to applicable i EPA Acknowledgm quantity generator Signature Export from U.S.	Port of Date le	mall quantity g	mental regulation	s. If export s	hipment and	I am the Pr	ay Year ay Year ay Year ay Year
marke Expor I certification of the Control of the C	ed and labeled/placa riter, I certify that the to iffy that the waste min is/Officer's Printed/Ty ational Shipments er signature (for expo- porter Acknowledgment er 1 Printed/Typed Na- er 2 Printed/Typed Na-	rded, and are in all respects in proper condition contents of this consignment conform to the ter imization statement identified in 40 CFR 262.2 ped Name Import to U.S. arts only): at of Receipt of Materials The Keith Legice The Materials	n for transport accor rms of the attached 27(a) (if I am a large	rding to applicable i EPA Acknowledgm quantity generator Signature Export from U.S.	Port of Date le	mall quantity grent and the second sec	mental regulation enerator) is true.	s. If export s	hipment and	I am the Pr	ay Year
marke Expor I certii Generator's 16. Internat 17. Transporter 17. Transporter 18. Discrep 18a. D	red and labeled/placa riter, I certify that the iffy that the waste min iffy that the waste min iffy that the waste min iffy the control of the control of iffy the c	rded, and are in all respects in proper condition contents of this consignment conform to the terimization statement identified in 40 CFR 262.2 ped Name Import to U.S. rts only): at of Receipt of Materials The Keith Legice Quantity	n for transport accor	rding to applicable i EPA Acknowledgm quantity generator Signature Export from U.S.	Port of Date le	mall quantity grent and the second sec	mental regulation	s. If export s	hipment and	I am the Pr	ay Year ay Year ay Year ay Year
marke Expor I certii Generator's 16. Internat 17. Transporter 17. Transporter 17. Transporter 18. Discrep 18a. Discrep 18b. Altern 18b. Altern Facility's P	red and labeled/placa rder, I certify that the idify that the waste min s/Office or's Printed/Ty ational Shipments er signature (for expo- porter Acknowledgmer er 1 Printed/Typed Na er 2 Printed/Typed Na er pancy repancy Indication Sp mate Facility (or Gene	rded, and are in all respects in proper condition contents of this consignment conform to the ter imization statement identified in 40 CFR 262.2 ped Name Import to U.S. rds only): It of Receipt of Materials The Keith Leake are imme August and a conformation of the conformation of th	n for transport accor	rding to applicable i EPA Acknowledgm quantity generator Signature Export from U.S.	Port of Date le	mall quantity grent and the second sec	mental regulation enerator) is true.	s. If export s	hipment and	I lam the Pr	ay Year ay Year ay Year ay Year
marke Expor I certii Generator's 16. Internat Transporter 17. Transporter 17. Transporter 18. Discrep 18a. Discrep 18a. Discrep 18b. Altern Facility's P 18c. Signal	red and labeled/placa riter, I certify that the total rify that the waste min s/Office or's Printed/Ty attional Shipments er signature (for expo- porter Acknowledgmer er 1 Printed/Typed Na er 2 Printed/Typed Na er 2 Printed/Typed Na er 2 Printed/Typed Na er 3 Printed/Typed Na er 4 Printed/Typed Na er 5 Printed/Typed Na er 5 Printed/Typed Na er 6 Printed/Typed Na er 7 Printed/Typed Na er 8 Printed/Typed Na er 8 Printed/Typed Na er 9 Printed/Typed Na er 9 Printed/Typed Na er 1 Printed/Typed Na er 1 Printed/Typed Na er 2 Printed/Typed Na er 3 Printed/Typed Na er 3 Printed/Typed Na er 4 Printed/Typed Na er 5 Printed/Typed Na er 5 Printed/Typed Na er 6 Printed/Typed Na er 7 Printed/Typed Na er 7 Printed/Typed Na er 8 Printed/Typed Na er 9 Prin	rded, and are in all respects in proper condition contents of this consignment conform to the ter imization statement identified in 40 CFR 262.2 ped Name Import to U.S. rds only): It of Receipt of Materials The Keith Leake are imme August and a conformation of the conformation of th	n for transport accorring of the attached 27(a) (if I am a large	rding to applicable i EPA Acknowledgm quantity generator Signature Export from U.S. Signature	remational and ment of Consent. or (b) (if I am a s Port of Date le Residue Manifest Refere	entry/exit:aving U.S.:	mental regulation enerator) is true.	s. If export s	hipment and	I lam the Pr	ay Year ay Year ay Year Rejection
marke Expor I certii Generator's 16. Internat Transporter 17. Transporter 17. Transporter 18. Discrep 18a. Discrep 18b. Altern Facility's P 18c. Signa 19. Hazaro 1.	red and labeled/placa riter, I certify that the iffy that the waste min ify the wa	rded, and are in all respects in proper condition contents of this consignment conform to the terimization statement identified in 40 CFR 262.2 ped Name Import to U.S. arts only): Interfect of Materials	n for transport according of the attached 27(a) (if I am a large	rding to applicable i EPA Acknowledgm quantity generator Signature Export from U.S. Signature Signature 3.	recycling systems	entry/exit:aving U.S.:	mental regulation enerator) is true.	s. If export s	hipment and	I lam the Pr	ay Year ay Year ay Year Rejection
finance Expor I certification of the Internal Transporter 17. Transporter 18. Discrep 18a. Discrep 18b. Altern 18b. Altern 19b. Altern 19b. Hazard 1.	red and labeled/placa riter, I certify that the ' iffy that the waste min s/Offcoor's Printed/Ty attional Shipments er signature (for expo- porter Acknowledgmer er 1 Printed/Typed Na er 2 Printed/Typed Na er 2 Printed/Typed Na er 2 Printed/Typed Na er 3 Printed/Typed Na er 3 Printed/Typed Na er 4 Printed/Typed Na er 5 Printed/Typed Na er 5 Printed/Typed Na er 6 Printed/Typed Na er 7 Printed/Typed Na er 8 Printed/Typed Na er 8 Printed/Typed Na er 9 Printed/Ty	rded, and are in all respects in proper condition contents of this consignment conform to the ter imization statement identified in 40 CFR 262.2 ped Name Import to U.S. Irris only): It of Receipt of Materials me Keith Leake ace Quantity rator)	n for transport according of the attached 27(a) (if I am a large	rding to applicable in EPA Acknowledgm of quantity generator Signature Signa	recycling system:	entry/exit:aving U.S.:	mental regulation enerator) is true.	s. If export s	hipment and	I lam the Pr	ay Year ay Year ay Year Rejection
marke Expor I certification of the control of the c	red and labeled/placa riter, I certify that the iffy that the waste min ify the wa	rded, and are in all respects in proper condition contents of this consignment conform to the terimization statement identified in 40 CFR 262.2 ped Name Import to U.S. arts only): Interfect of Materials	n for transport according of the attached 27(a) (if I am a large	rding to applicable i EPA Acknowledgm quantity generator Signature Export from U.S. Signature Signature 3.	recycling system:	entry/exit:aving U.S.:	mental regulation enerator) is true.	s. If export s	hipment and	I lam the Pr	ay Year ay Year ay Year Rejection

Dear Rebecca,

Per your request last week, please see details below regarding each item:

1) All Uniform Hazardous Waste Manifests from the date of the inspection (5/17/16) to present.

We continue to operate as a small quantity generator. There has been one shipment of hazardous waste since May 17, 2016. The manifest is attached.

2) Documents demonstrating if the Emergency Response Plan was submitted to local police/fire departments and hospitals.

Because we have always operated as a small quantity generator of hazardous waste, the site Emergency Response Plan has not been distributed to the police, fire department and local hospital/emergency care center. That being said, as a matter of ensuring that local first responders are well informed about site operations, we have maintained a very good working relationship with the local fire company. West Hazleton Borough completes a fire inspection of the facility yearly which includes regular reviews the owner, operator, and emergency contact information, Hazardous Materials lists, SDS availability and physical location and condition of chemical storage and unloading areas. Facility chemical identification information, SDS's and locations are also available on the Pennsylvania Tier II System which State, County, and West Hazleton Emergency Management authorities have electronic access to.

- 3) A list of employees that perform weekly hazardous waste accumulation area inspections and any associated hazardous waste training for the last 3 years for each of those employees.
 - a. I'm not positive that I'm reading the initials on the inspection log copies I have correctly, but I have listed at least: PO, LW, GN, PK (or DK), and SS as having performed the inspections.

QA laboratory technicians perform the weekly hazardous waste accumulation area inspections, which are limited to the single hazardous waste accumulation area where waste laboratory chemicals from the laboratory are placed into one of two drums that are kept in a flammable storage cabinet. Notations on the log depend on which technician inspects the storage location during any given transfer of waste into the storage drum(s). The individuals who currently perform the task are as follows:

Rick Berdanier (RB)

Kathy Brojakowski (KB) - No Haz Com trauning

- Joe Esposito (JE)
- Drew Kemmerer (DK)
- Gary Neiswender (GN)
- Patti O'Donnell (PO)
- Stephanie Strohl (SS)
- Mary Thomas (MT)
- Morgan Wenner (MW)
- Linda Webster (LW) retired in December 2013.

Over the last three years QA technicians received the following annual training in regard to handling of waste:

- HAZ COM/Right to know training covers safe chemical handling of both hazardous and non-hazardous material. Our hazardous waste, which is primarily spent laboratory chemicals, comes from the laboratories and is considered to be a hazardous material. Training record provided (attachment 1).
- Chemical Hygiene/Lab Safety training consists of a review of the Plant Chemical
 Hygiene Plan which includes a section on Handling of Hazardous Waste (attachment 2).
 Training record provided (attachment 3).
- 3. Emergency Response, Preparedness and Evacuation training covers how to respond to emergencies which includes a spill of hazardous materials, which would again include hazardous waste. Training record provided (attachment 4).

Please let me know if you have any questions,

Terry

Terry Hartlage, Plant Manager Henkel Consumer Goods, Inc. 125 Jaycee Drive West Hazleton, PA 18222

1

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature:	Jury Hai	that	
Name:	Terry Hartlage		
Title:	Plant Manager	À	

1



Chemical Hygiene Plan-West Hazleton site

TABLE OF CONTENTS

I.	Introduction	2							
II.	Standard Operating Procedures								
	A) General Laboratory Safety Rules								
	B) Compressed Gases								
	C) Electrical Safety								
	D) Chemical Spins and Disposal	3							
	E) Personal Contamination	5							
	F) Lab Hoods and Ventilation	6							
	H) Lab Safety & Personnel	7							
	Chemical Storage H) Lab Safety & Personnel Handling Hazardous Waste	7							
2.	n a c n n 1	0							
	K) Laboratory Reference Material	8							
	L) Evacuation Plan								
III.	Laboratory Exposure Control Measures								
	A) Engineering Controls	9							
	B) Maintenance and Specification Requirements	9							
	Hood Maintenance and Specifications	9							
	Safety Shower/Eye Wash Station	9							
	Fire Protection Maintenance	9							
	C) Personal Protective Equipment	9							
	D) Lab Safety Equipment	10							
IV.	List of Solvents, Acid and Base Chemicals Routinely Used	In the Leb							
ΙΥ.	10 0 1	10							
	,	10							
	C) Other	10							
V.	Provisions for Employee Information and Training	11							
VI.	Circumstances Which Require Prior Approval	11							
VII.	Provisions for Medical Consultation and Examination	11							
VIII.	Annual Review and Update	11							

Attachment 2

I. Handling Hazardous Waste - Emergency Contingency Plan

EMERGENCY CONTACTS

Tony Swetz ext. 105 Home: (570)454-6043 Cell: (570) 956-0144 Janine Surmick ext. 167 Home: (570)455-0964 Cell: (570) 956-0460 Dan Dule ext. 175 Home: (570)788-0693 Cell: (570) 407-1930

EMERGENCY INFORMATION

Fire Dept. 911 Police Dept. 911 Ambulance 911

Lehigh Valley Hospital -Hazleton (570) 501- 4000 GHHA Occupational Health Clinic (570) 501 - 6800 Poison Control Center 1-800-521-6110

LABORATORY

Alarm Evacuation Codes: Same as for fire - Alarm sounds

Emergency Response Measures

In the event of a fire, dial 333# from any phone and announce the location of the fire. If the size of the fire permits, attempt to extinguish it using an appropriate extinguisher.

In the event of a spill, contain the flow of the hazardous material as much as possible, and as soon as practical, clean up the hazardous waste and any contaminated materials or soil. Contact the Chemical Response Team as soon as possible.

Page 1 - Cover Page	F	BE#:	BET#:	Training Attendance Record Form 7/1/2011 BE
	632-859-1680.		Submit an electronic copy to $\underline{HRDirect}$ (via the portal) or fax a copy to $\underline{HRDirect}$ at	Submit an el
		or data entry:	te: 2014 Special Instructions for data entry:	Does this training require renewal? 🛛 Y 🔲 N Renewal Date: 2014
3/25/96	Hartlage	02073257	mus) women	10. Surmick,Janine M
7/1/03	Surmick	02073357	Schrody !	9. Strohl, Stephanie S
10/2/90	Surmick	02073329	lette Conde	8. O'Donnell, Patti
11/4/96	Surmick	02073270	"Broken ()	7. Neiswender, Gary S
9/17/01	Surmick	02073323	reduction.	6. Mecir,Patricia A
5/14/12	Surmick	20039247	lot Vacon	5. Kennedy,Patrick
7/29/09	Surmick	20012329	SARC III	4. Jarosh, Jonathan P
1/31/00	Surmick	02073298		3. Dule,Daniel
9/22/03	Surmick	02073361	Mulene Cully	2. Cully,Marlene .
1/15/03	Surmick	02073344	The Short	1. Berdanier, Richard
Hire Date	Supervisor	Global (Employee) ID (Required)	Signature Gic	(as it appears on paycheck)
☐ SHE & Quality☐ Strategic Mgmt.	☐ Personal Dev. ☐ Sales / Mktg.	□ Languages □ Leadership	ee) ID #(s) if Henkel employee(s)) Engineering / Equipment	(Indude Global (employee) ID #(s) if Henkel employee(s)) Please categorize this training: (Check one) Chemical / Product Training
m 🔲 Virtual	Method of Delivery: ⊠ Classroom	Method of		Instructor(s): Gary Neiswender
Transp. Cost: (if known)	ate if total or per person	Material Cost	Tuition: (Chargeback cost to participant)	Henkel Contact: (Name of Henkel person organizing training)
	(Vendor address / location – if known)	(Vendor address	(Name of training company)	(Name of tra
				Provider: Henkel Vendor
QA	Business Unit:		□ Off-site	Location: Menkel facility West Hazleton
Total hours: 0.5hrs	1:30pm Total	End Time(s): 1	Start Time(s): 1:00pm	Date(s): 2/18/13
(If applicable)			class is delivered)	(Please use the same title each time this class is delivered)
	CEUs:		tion	Course Title: Emergency Response and Evacuation
Cover Page – Required.		ce Record	Training Attendance Record	Henkel
THOCKMENT 4	4			

1	T
l	œ
1	*
1	۳

Attachment 4

Course Title: Emergency Response and Evacuation

Date(s):

2/18/13

(Please use the same title each time this class is delivered)

Start Time(s):

1:00pm

End Time(s): 1:30pm

CEUs: (If applicable)

m Total hours: 0.5hrs

PARTICIPANTS	Signature	Clabal (Emala		
Print Full Legal Name (as it appears on paycheck) 1. Thomas, Mary F		(Required)	Supervisor	Hire Date
3 11/- [るるアー	02073199	Surmick	3/2/88
4. webster, Linda K	X. Mohatin	02073366	Surmick	9/29/03
3.				
4.				
ù				
6.				
7.				
80				
0			`*	
10				
1.				
12.				
13.				
14.				
15.			į.	
16		•		
17		y		
18				
10				
20				

1	T	1
V	Q	1
1	릇	
1	0	J
- 7	$\overline{}$	

	H
Cover F	pc
r Page	N.A.
Ŕ	er)
uired.	1+1
	-

Page 1 - Cover Page	-859-1680.	al) or fax a copy to HRDirect at 632 BE#:	BET#: BE#:	Training Attendance Record Form 7/1/2011
			Submit an electronic copy to HRDirect (via the root)	
		s for data entry:	Renewal Date: 2015 Special Instructions for data entry:	Does this training require renewal? ⊠Y □N
7/1/03	Surmick	02073357	MONO SON	an or orthoropium is o
10/2/90	Surmick	02073329	Asth o'Especiel	10. Strohl Stephania C
11/4/96	Surmick	02073270	Dy Love and	9. O'Donnell Patti
9/17/01	Surmick	02073323	Takens Willsen	8. Neiswender Gary S
5/14/12	Surmick	20039247	Bot May	
2/19/13	Surmick	20046815	Con Conserve	6. Kennedy Patrick
7/29/09	Surmick	20012329	THE THE	5 Kemmerer Andrew
1/31/00	Surmick	02073298		4. Jarosh Jonathan P
9/22/03	Surmick	020/3361	Millery Cully	3. Dule,Daniel
1/15/03	Surmick	020/3344	The later of the l	2. Cully, Marlene
Hire Date	Supervisor		100/0	Berdanier, Richard 1. Berdanier, Richard
□ Strategic M	L Sales / MKlg.	al (Employee) To	Signature	PARTICIPANTS
SHE & Quality	Personal Dev.	jal ☐ Languages	☐ Engineering / Equipment ☐ HR & Legal ☐ General Business Admin. ☐ IT / Computer	☐ Chemical / Product Training ☐ Communication / Presentations
			(undude Global (employee) ID #(s) if Henkel employee(s)) sining: (Check one)	(undude Global (employ) Please categorize this training: (Check one)
	Delivery: Classroom	Method of Delivery:		1
Transp. Cost: (If known)	r per person	Material Cost	organizing braining) (Chargeback cost to participant)	(Name of Henkel person organizing baining) Instructor(s): Gary Neiswander
Trainer's	(vendor address / location – if known) dor Invoice / Trair	Vendor Invoice /	Tuition:	Henkel Contact:
		Manda	(Name of training company)	
AAO XO NG	Contract Cities			Provider: ⊠ Henkel ☐ Vendor
Ξ,	Brisinese		West Hazleton ☐ Off-site	Location: Henkel facility Wes
(If applicable)	10:30 Total	End Time(s): 1	Start Time(s): 10:00	1/13/1
	CEUs:		(Please use the same title each time this class is delivered)	(Please use the same title
			e and Evacuation	Course Title: Emergency Response and Evacuation
COVEL L'age - Required.	_			200

,	7
l	0
l	킂
١	0
20	

HUCKMENT 4 Use if additional pages are needed.

Course Title: Emergency Response and Evacuation
(Please use the same title each time this dass is delivered)

CEUs:

(If applicable)

Start Time(s): 10:00

Date(s): 1/13/14

10:30

End Time(s):

Total hours: 0.5

	, io	10	177	16	15	14	13.	12.	11.	IO.	9.	۵.	7.	6.	5.	4,	3.Webster,Linda R	2.Thomas,Mary E	1.5umick,Janine M	PARTICIPANTS Print Full Legal Name (as it appears on paycheck)
																	()/%	May C. Jan	(prince thank	Signature)
																2 3	02073366	02073199	02073257	Global (Employee) ID (Required)
																	Surmick	Surmick	Hartlage	Supervisor
																	9/29/03	3/2/88	3/25/96	Hire Date

8	١.	_	`
ŕ	v	-	•/
	A	7	
	E٦	10	
		٧	
	1	\mathbf{E}	
;	1	0	١,
ì	•	C	1
•			

3.5	
,	i
ď	j
C)
<	į
G)
m	1
*	r
	ì
×	í
=	•
	,
	l
	i
2	Į
C	ĺ
C	į
C	3
Ξ	3
7	
34	1
	٩
٠,	1
, ,]
	COVE Take - Required

	1 - Cover Page	t 632-859-1680.	fax a copy to HRDirect at 6:	Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect a	Submit an electroni	Training Attendance R	
			lata entry:	Special Instructions for data entry:	N Renewal Date:	Does this training require renewal? ∐Y ⊠	
	7/1/2003	Dan Dule	02073357	JCSO / COS	25	11. Strohl, Stephanie	
	. 11/1/1999	Janine Surmick	305410	navy Durkellan.	JY.	10. Ringleben, Mary	
	10/2/1990	Dan Dule	02073329	H'i' Om Ed	A Royal Barrer	9. O'Donell, Patti	
	9/7/2006	Dan Dule	225164	Edu)	1.	8. Fred Ney	
۱.	11/4/1996	Dan Dule	02073270	* Alexan	B	7. Neiswender, Gary S	
	9/17/2001	Dan Dule	02073323	ture de Men		6. Medir, Patridia A	
	2/19/2013	Dan Dule	20046815	S. L.		5. Kemmerer, Andrew	
	7/29/2009	Janine Surmick	20012329	ALL -	A	4. Jarosh, Jonathan	
	3/4/2014	Dan Dule	2008634	Edwid Travell	do	3. Esposito, Joseph	
	1/31/2000	Janine Surmick	02073298	K) Y	a V	2. Dule, Daniel	
	1/15/2003	Dan Dule	02073344	MA WIT		1. Berdanier, Richard	
	. Hire Date	Supervisor	Global (Employee) ID (Required)		n paycheck) Signature	PARTICIPANTS Print Full Legal Name (as it appears on paycheck)	
	SHE & Quality Strategic Mgmt.	☐ Personal Dev. ☐ Sales / Mktg.	☐ Languages ☐ Leadership	Equipment	☐ Engineering / Equipment☐ General Business Admin.	☐ Chemical / Product Training ☐ Communication / Presentations	
				and anthoryca(s))	aining: (Check one)	Please categorize this training: (Check one)	
				akel employee(c))	(employee) In #/c) if Ha	The Charles of the Ch	. 11
	t) (If known)	(Indicate if total or per person cost) OfEDelivery: ⊠ Classroom	Method	(Chargeback cost to participant)	(Name of Henkel person organizing training)	(Name of Henkel per	1175
	Trainer's Cost.	Managana Managana	vendor Invoice	Tuition		Henkel Contact: NA	12.75
		(Vendor address / location - if known)	(Vendor address ,	ompany)	(Name of training company)	the constitution of the antique of the constitution of the constit	E.
					~~ ·	Provider ⊠ Henkel ☐ Vendor	Late pol
*	QA	Business Unit:		☐ Off-site	Hazleton .	Location: Menkel facility Ha	ALAFIA
	hours	10:30 am	End Time(s) 10	rt-Tme(s): 10:00 am	Sta	Date(S); 5/2/15	119.50.
7	(If applicable)		•	delivered)	(Please use the same title each time this class is delivered)	Course Itle: (Please use the same t	7
-	グギゼ	GEUs			edness	Emergency Preparedness	1.11

(Please use the same title each time this class is delivered)
Start Time(s):

PARTICIPANTS	Signature	Global (Employee) ID	Supervisor -	Hire Date
Print Full Legal Name (as it appears on paycheck)		(Required)		
12. Surmick, Janine	Jan Star J.	02073257	Dan Dule	3/25/1996
13. Thomas, Mary	They you	066502	Dan Dule	3/2/1988
14. Wenner, Morgan	Mondon Manne	20089721	Dan Dule	10/20/2014

_	1
I	1
Ð	1
봊	
22	1
	Henk

	Ŧ
S	200
ver Page	3
ge - R	FUZ.
equire	u
ř	

	632-859-1680.	ax a copy to HRDirect at 63	Submit an electronic copy to $\underline{HRDirect}$ (via the portal) or fax a copy to $\underline{HRDirect}$ at	υS
to		ata entry:	Renewal Date: 2014 Special Instructions for data entry:	Does this training require renewal? ⊠ Y ☐ N Re
7/1/03	Surmick	02073357	Sprand X	10. Stront, Stephanie S
10/2/90	Surmick	02073329	Post o'Emall	9. O'Donnell, Patti
11/4/96	Surmick	02073270	Day Holdsburg	a. Neiswender, Gary S
9/17/01	Surmick	02073323	(SalMen)	/. Mecir, Patricia A
5/14/12	Surmick	20039247	Most the	b. Kennedy,Patrick
2/19/13	Surmick	20046815	As Norma	
7/29/09	Surmick	20012329	Ches !	4. Jarosn, Jonathan P
1/31/00	Surmick	02073298		3. Dule, Daniel
9/22/03	Surnick	02073361	Markens Cucky	z. cully, variene
1/15/03	Surmick	02073344	SURBLU	- Perdelici Nation
Hire Date	Supervisor	Global (Employee) ID (Required)	signature	Print Full Legal (Name (as it appears on paycheck)
SHE & Quality Strategic Mgmt.	☐ Personal Dev.☐ Sales / Mktg.	☐ Languages ☐ Leadership	Engineering / Equipment	☐ Chemical / Product Training ☐ Communication / Presentations ☐
	- 40		(unclude Global (employee) ID #(s) If Henkel employee(s)) sining: (Check one)	Please categorize this training: (Check one)
	of Delivery: 🛛 Classroom	Method of		Instructor(s): Gary Neiswender
cost) (if known)	(indicate if total or per person cost)		inizing training) (Chargeback cost to participant)	į
Trainer's		Vendor Invoice /	Tuition:	Henkel Contact:
	(Vendor address / location – if known)	(Vendor address	(Name of training company)	O Company
	-			Provider: ⊠ Henkel □ Vendor
QA	Business Unit:		zleton	Location: Menkel facility West Hazleton
(If applicable) Total hours: 0.5	10:30am Total	End Time(s): 1	Start Time(s): 10:00am	Date(s): 9/13/13
	CEUs:		The this class is delicered	(Please like the same title each time this class is delicated)
Cover Page - Required.		e Record	ו raining Attendance Record	(Henkel)
Hachment 3	To			

Hudh man 3
Use if additional pages are needed.

Course Title: Chemical Hygine/Lab SafeTy

(Please use the same title each time this class is delivered)

Start Time(s): 10:00am

End Time(s): 10:30am

CEUs:

Total hours: 0.5 (If applicable)

20.	19.	18.	17.	16.	15.	14.	13.	12.	10.	io	φ.	7.	6.	5.	4.	3.Webster,Linda R LW	2.Thomas,Mary E	1.Surmick, Janine M	Print Full Legal Name (as it appears on paycheck)
																Kindle Webston	ordan C	Mers Sura	Signature ()
							The state of the s									02073366	02073199	02073257	Global (Employee) ID
															8	Surmick	Surmick	Hartlage	Supervisor
																9/29/03	3/2/88	3/25/96	Hire Date

Olos. course Title Chewich L Hygiene Date(s) Instructor(s): Gary Neiswender Provider: Henkel Training Attendance Record Form 7/1/2011 Does this training require renewal? Please categorize this training: (Check one) Location: 9. Ney,Fred J Neiswender, Gary S 7. Mecir, Patricia A Kemmerer, Andrew Jarosh, Jonathan P Esposito, Joseph 3. Dule, Daniel 2. Cully, Marlene 1. Berdanier, Richard PARTICIPANTS 10. O'Donnell, Patti Print Full Legal Name (as it appears on paycheck) Chemical / Product Training Communication / Presentations 8/29/14 ⊠ Henkel (Please use the same title each time this class is delivered) (Name of Henkel person organizing training) (Include Global (employee) ID #(s) if Henkel employee(s)) ☐ Vendor N N West Hazleton Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680. Renewal Date: 2015 (Name of training company) Engineering / Equipment General Business Admin. LIGHT GOLLY Signature Start Time(s) 10:00 Training Attendance Record (Chargeback cost to participant) Special Instructions for data entry: ☐ Off-site] HR & Legal] IT / Computer Global (Employee) ID (Required) 02073329 02073361 02073344 02073323 20046815 20012329 02073298 02073396 02073270 20088634 Vendor Invoice/ End Time(s): 10:30 Material Cost ☐ Languages ☐ Leadership (Vendor address / location - if known) Method of Delivery: (indicate if total or per person cost) Supervisor Personal Dev.
Sales / Mktg. Surmick Business Unit CEUs: Total hours: 0.5 Transp. Cost. Trainer's Cover Page = Required BC & UW (If applicable) SHE & Quality Strategic Mgmt Hire Date 9/17/01 2/19/13 9/22/03 3/4/14 1/31/00 10/2/90 9/7/06 11/4/96 7/29/09 1/15/03 ☐ Virtual (if known)

Page 1 - Cover Page

Attachment 3

Henkel

Training Attendance Record

Hachment 3 Use if additional pages are needed.

Course Title Chemical Hygiene /Lab Safety

(Please use the same title each time this class is delivered)

14

Scart Time(s) 10:00

Datte(s): 8/29/14

End Time(s): 10:30

(If applicable)
Total hours: 0.5

CEUS

PARTICIPANTS Print Evil Legal Name (as it appears on paycheck)	Signature	Global (Employee) ID (Required)	Supervisor	Hire Date
1.Strohl,Stephanie S	Stonon Ston	02073357	Surmick	7/1/03
2.Surmick,Janine M	A COLOR OF THE PROPERTY OF THE	02073257	Hartlage	3/25/96
3.Thomas,Mary E	Was Still	02073199	Surmick	3/2/88
4.				
C.		0		
.6.				
7. 5.				
φ,				
9.				
10.				
14.		9		
12.		•		
13.				
14,				
15.		V		
16.	-			
17.			٠	4
18.		•		
19.				
20.		3		
A CONTRACTOR OF THE PARTY OF TH				



Attachment 3

Cover Page - Required:

Total hours SOMIAS

(If applicable)

Does this training require renewal? 🖂 Y 🛛 N Please categorize this training: (Check one 9. Ringleben, Mary 8. O'Donnell, Patti 3. Dule, Daniel Date(s) 10. Strohl, Stephanie Esposito, Joseph 2. Brojakowski, Kathy Print Full Legal Name (as it appears on paycheck)

1. Berdanier, Richard Course Title Neiswender, Gary. S PARTICIPANTS Jarosh, Jonathan Kemmerer, Andrew ☐ Chemical / Product Training ☐ Communication / Presentations 10/24/15 ⋈ Henkel facility ⊠ Henkel (Please use the same the each time this class is delivered) , Lab Safety (Name of Henkel person organizing training) (Include Global (employee) ID #(s) if Henkel employee(s)) □ Vendor SS 2 8 ZX O CO Hazleton ☐ Engineering / Equipment☐ General Business Admin. Submit an electronic copy to HRDitect (via the portal) or fax a copy to HRDirect at 632-859-1680. Renewal Date: 2046 (Name of training company) Signature Mary Kingh bor Start Time(s) 10:00 am (Chargeback cost to participant) Special Instructions for data entry そのファ ☐ Off-site] HR & Legal .] IT / Computer Global (Employee) ID (Required) 02073357 20101403 02073329 02073298 20012329 02073270 20046815 2008634 02073344, 305410 End Time(s): 10:30 am (Vendor address / location - if known) Languages (indicate if total or per person cost) Supervisor ☐ Personal Dev.☐ Sales / Mktg. Janine Surmick Janine Surmick Janine Surmick Dan Dule Business Unit: QA CEUs:

Strategic Mgm
Strategic Mgm

☐ Virtual (if known)

Hire Date . Strategic Mgmt

5/18/2015

1/15/2003

2/19/2013

7/29/2009 3/4/2014 1/31/2000

Training Attendance Record Form 7/1/2011

Page 1 - Cover Page

7/1/2003

11/1/1999 10/2/1990 11/4/1996



Use if additional pages are needed.

10:00 am

PARTICIPANTS Print Full Legal Name (as it appears on paycheck) 11. Surmick, Janine 12. Thomas, Mary 13. Wenner, Morgan Mowadul A gum Global (Employee) ID (Required) 02073257 066502	(as it appears on paycheck) Mount Mondail I green
Signature January Many January	Signature Global (Employee) ID Supervision (Required) Man Sup 10 066502 Mount 1 9000 20089721
Millery	Global (Employee) ID Supervis (Required) 02073257 066502
Global (Employee) ID (Required) 02073257 066502 066502	Global (Employee) ID Supervis (Required) Supervis 02073257 066502
Global (Employee) ID (Required) 2 02073257 066502	Global (Employee) ID Supervis (Required) Supervis 02073257 066502
	Supervisor Dan Dule Dan Dule Dan Dule

4/18/17

Dial Corp. - Received voice message from Scott Eide at Henkel Corp. on Thurs. 4/13/17 @ 2:18pm to call back. No specifics in request-Call back #: 281-216-7451

-Spoke W/ Chris Minshall ~8:15am on Tues. 4/18/17.

- TO call Fac rep back. Determine position at company. Attorney?

I have thris & I call back

4 Inform having enf. discussions will have letter out in week or two outlining outcome of insp.+

next steps:

4/18/17 8:25 am call back-no answer.

-no voicemessage, will try back shortly.

10:20 am call back - answered.

Scott -> oversight of NA. new addressed to the Facility manager cc: Scott Eady 1110 Nosa Parkway Suite 470 Houston, TX 77085

ENFORCEMENT PRIORITY SCREENING CHECKLIST ENFORCEMENT SENSITIVE - DO NOT RELEASE

Name and Location of Violator:	Program Contact: Rebecca Serfass – x2047
Dial Corporation	Redecca Sciiass — X2047
125 Jaycee Drive	
West Hazelton, PA 18201	
PAD 987 271 012	
"SQG"	
	106
Industry NAICS Code: 325611	f of Employees:
Date of Inspection: 5/17/16	Annual Income:
Date of Inspection.	•
Recommended Action: APO EJ	Area:
Recommended Action: At O	11 ca
00015	21 Juan 2g Hoolth Iggmos
Projected Quarter: Q2/3-17 Cl	hildren's Health Issue:
SCREENING QUI	ESTIONS
Schall in to go	
_	
1. What is the violation(s)? Were there viola manifest, DMRs, lab reports or training? D or local environmental agency of informatio otherwise undermine the regulatory scheme	id the violation(s) deprive EPA or any state on critical to its program operation or
G. Failure to submit BR for 2013 & 201 H. Failure to notify as a LQG for many L. Failure to provide adequate training	[40 CFR 273.14(e)] os [40 CFR 273.13(d)(1)] R 273.15(c)] EC in CP [40 CFR 265.52(d)] ncy plan to local authorities [40 CFR 265.53] 5 [40 CFR 262.41] months in 2013, 2014, & 2015 [RCRA 3010]

2. Could or did the violation cause or contrib environment? Is the violation continuing?	ute to actual harm to public health or the
No. Unknown.	
3. Is this a repeat or recurring violation or vio	olator? Is there a history of non-
No.	
a .	
4. Is this a significant/high priority violation a	according to the program's guidance?
No.	
5. Are there known or suspected violations of case have multi-media potential?	other regulatory requirements? Does this
No.	
6. Have there been any State enforcement acti	ons taken for the violation(s)?
No.	
- 2	

7. Has the company or any individuals employed by the company submitted false or misleading information or documents? Has there been any tampering with monitoring equipment?
No.
8. Does the violation involve knowing, willful or negligent conduct by the company or any individual employed by the company? Is there evidence that the violator was, or should have been, aware of the requirement(s) which were violated? Please describe:
No.
9. Is it known whether the violator has received compliance assistance and has failed to correct the violation in a timely manner? Please describe:
No.
10. Is it suspected that the violator may have obtained an economic benefit or an unfair competitive advantage in its industry from its noncompliance?
Unknown.
11. Should an enforcement action proceed to the penalty stage, are there any known SEP proposals that might be brought to the violator's attention?
No.

12. Did the violation occur in a Community Based, Sector Based or Regional Strategic Planning Priority Area as reflected in the current Enforcement MOA or elsewhere?				
No.				

Enforcement Options:

No Action Warning Letter NOV/NON State Lead NOD AO APO Judicial Referral Criminal Referral



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1650 Arch Street Philadelphia, Pennsylvania 19103-2029

VIA UPS

Ms. Melissa Gross, Chief
Hazardous Waste Compliance and Enforcement
Department of Environmental Protection
Rachel Carson Building
P.O. Box 8763
Harrisburg, PA 17105-8763

SEP 1 2 2016

Re:

RCRA Administrative Penalty Order

Dial Corporation

EPA ID No. PAD987271012

Dear Ms. Gross,

The U.S. Environmental Protection Agency, Region III is pursuing the issuance of an Administrative Penalty Order ("APO") to Dial Corporation located in West Hazelton, PA pursuant to the Resource Conservation and Recovery Act ("RCRA") as amended by the Hazardous and Solid Waste Amendments (HSWA) of 1984. The APO will address violations of RCRA Subtitle C.

We appreciate you cooperation in this matter and look forward to your continued efforts towards a successful enforcement program. Should you have any questions or concerns regarding this proceeding, please feel free to contact me at (215) 814-5430 or Rebecca Serfass at (215) 814-2047.

Sincerely,

Carol Amend, Associate Director Land and Chemicals Division

arol lineral

Office of Land Enforcement

cc: R. Serfass, 3LC70

Updated 12-27-16

RCRA-C VIOLATION - COUNT I

for penalty

WPOH.

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Operation of a treatment, disposal, or storage facility without a permit [40 CFR 270.1(b)] incorporates by reference [40 CFR 262.34]

HOW FACILITY VIOLATED REGULATION:

- OA. Storage of HW for greater than 90 days
 - B. Failure to keep closed container of HW
 - C. Failure to provide home address of EC in Contingency Plan
 - D. Failure to provide copies of CP to local authorities

SUPPORTING EVIDENCE:

- A. Manifest Information; See Manifest Info at end of Insp. Rpt. with highlighted areas
- B. Insp. Rpt. pg 7, para. 3; Insp. Rpt. pg. 8, para. 5; Photo #14; Photo #26
- C. Copy of Facility's Emergency Response Plan, Attachment G of Inspection Report
- D. Facility follow-up response stating that they have a good working relationship with local authorities, but did not send them the CP since they operate an as SQG
 - a. Lack of documentation to show CP was sent to local authorities

Potential for Harm: Moderate Extent of Deviation: Moderate

Using older penalty matrix due to being LQG last on 8/30/15

Penalty: \$9,210

\$750 = \$ 92,250

Multiday: 123 days x \$1,295 = \$159,285

Total = \$168,495 \$101,460

Discuss multi-day # if we want to bring total penalty # down

984

total # 118,894

Dropping due to fluctuation in generator status, PA regs state to notify, "unless temporarily"

RCRA-C VIOLATION COUNT II

FACILITY NAME:

Dial Corporation
125 Jaycee Drive
West Hazelton, PA 18201

VIOLATION:

Failure to submit subsequent notification under RCRA 3010 as a Large Quantity Generator [25 PA 262a.12(b)(1)]

HOW FACILITY VIOLATED REGULATION:

A. Facility failed to submit subsequent notification using EPA Form 8700-12 to the state to notify them of their change to LQG status during many throughout 2013, 2014, and 2015. Large basis of RCRA program

SUPPORTING EVIDENCE:

- A. RCRA Info no notification updates
 - a. State representative confirm
 - b. Facility representative confirm

Potential for Harm: Moderate
Extent of Deviation: Moderate

Penalty: \$10,602

RCRA-C VIOLATION – COUNT II

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to submit Biennial Report [40 CFR 262.41]

HOW FACILITY VIOLATED REGULATION:

A. Facility failed to submit a Biennial Report documenting HW generation during years 2013 and 2015 (Deadline was March 2014 and March 2016)

SUPPORTING EVIDENCE:

- A. RCRA Info No BR records
 - a. Facility rep confirmation + no records on site

Potential for Harm: Moderate Minor Extent of Deviation: Moderate Mayor

Old penalty matrix # for March 2014, New penalty matrix # for March 2016

Penalty: -\$9,210 + \$10,602

Total: \$19,812 7,000

3190 + 4,250 + 4,892 \$ 9,142

Dropping, due to training records appearing to be adequate

RCRA-C VIOLATION COUNT IV

FACILITY NAME:

Dial Corporation
125 Jaycee Drive
West Hazelton, PA 18201

VIOLATION:

Failure to provide adequate training to employees responsible for handling HW [40 CFR 265.16(a)]

HOW FACILITY VIOLATED THE REGULATION:

- A. Facility failed to provide RCRA HW training to employees conducting HWAA weekly inspections
 - a. Facility provided documentation of a Hazardous Communication / Global Harmonization training. Unsure as to whether it included RCRA topics.

SUPPORTING EVIDENCE:

A. Facility follow up documents haz. com./global harmonization training, no RCRA specific may meet requirements. Inspection observations, inadequate RCRA training led to operation under incorrect generator status

Potential for Harm: Moderate Extent of Deviation: Minor

Penalty: \$4,893

RCRA-C VIOLATION - COUNT III

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to provide a home address for Emergency Coordinator within Contingency Plan [40 CFR 265.52(d)]

HOW FACILITY VIOLATED THE REGULATION:

A. Home address of designated Emergency Coordinator not listed within the Facility's Contingency Plan

SUPPORTING EVIDENCE:

A. Copy of Facility's Emergency Response Plan, Attachment G of Inspection Report

Old penalty matrix #, last time LQG was 8/30/15

Potential for Harm: Minor Extent of Deviation: Minor

Penalty: \$430

RCRA-C VIOLATION - COUNT IV

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to provide copies of Facility Contingency Plan to local authorities [40 CFR 265.53]

HOW FACILITY VIOLATED REGULATION:

A. Facility failed to send copies of its CP to local authorities

SUPPORTING EVIDENCE:

- A. Facility follow-up response stating that they have a good working relationship with local authorities, but did not send them the CP since they operate an as SQG
 - a. Lack of documentation to show CP was sent to local authorities

Old penalty matrix #, last time LQG was 8/30/15

Potential for Harm: Moderate Extent of Deviation: Minor

Penalty: \$5,670

RCRA-C VIOLATION - COUNT V

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to keep container of HW closed [40 CFR 265.173]

HOW FACILITY VIOLATED THE REGULATION:

A. Facility failed to keep closed (2) satellite containers of aerosol cans managed as HW before they are taken to be punctured.

SUPPORTING EVIDENCE:

A. Insp. Rpt. pg 7, para. 3; Insp. Rpt. pg. 8, para. 5; Photo #14; Photo #26

Potential for Harm: Minor Extent of Deviation: Minor

Penalty: \$815

RCRA-C VIOLATION - COUNT VI

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to contain UW lamps in secure, closed container [40 CFR 273.13(d)(1)]

HOW FACILITY VIOLATED THE REGULATION:

- A. UW lamp box was initially closed, Facility representative moved the box (slightly) to determine if it was labeled and the top of the cardboard ripped off instantly.
 - a. Not secure to prevent release

SUPPORTING EVIDENCE:

A. Insp. Rpt. pg. 8, para. 7; Photo #32

Potential for Harm: Minor Extent of Deviation: Minor

Penalty: \$489

thanks can divined during

RCRA-C VIOLATION - COUNT VII

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to label UW lamp container [40 CFR 273.14(e)]

HOW FACILITY VIOLATED REGULATION:

A. UW lamp containers did not have visible labels. Universal Waste label was found, underneath the shipping label after Facility representative peeled shipping label back. Box for Universal Waste "lamps" was not checked off

SUPPORTING EVIDENCE:

A. Insp. Rpt. pg. 9, para. 1; Photo #33

Potential for Harm: Minor Extent of Deviation: Minor

RCRA-C VIOLATION - COUNT VIII

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to mark UW batteries with start accumulation date [40 CFR 273.15(c)]

HOW FACILITY VIOLATED THE REGULATION:

A. Facility contained UW batteries in a container that was not labeled with the start accumulation date

SUPPORTING EVIDENCE:

A. Insp. Rpt. pg. 9, para. 2; Photo #35

Potential for Harm: Minor Extent of Deviation: Minor

Penalty: \$489

Total: \$196,689

RCRA-C VIOLATION - COUNT I

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Operation of a treatment, disposal, or storage facility without a permit [40 CFR 270.1(b)] incorporates by reference [40 CFR 262.34]

HOW FACILITY VIOLATED REGULATION:

- A. Storage of HW for greater than 90 days
- B. Failure to keep closed container of HW
- C. Failure to provide home address of EC in Contingency Plan
- D. Failure to provide copies of CP to local authorities

SUPPORTING EVIDENCE:

- A. Manifest Information; See Manifest Info at end of Insp. Rpt. with highlighted areas
- B. Insp. Rpt. pg 7, para. 3; Insp. Rpt. pg. 8, para. 5; Photo #14; Photo #26
- C. Copy of Facility's Emergency Response Plan, Attachment G of Inspection Report
- D. Facility follow-up response stating that they have a good working relationship with local authorities, but did not send them the CP since they operate an as SQG
 - a. Lack of documentation to show CP was sent to local authorities

Potential for Harm: Moderate Extent of Deviation: Moderate

Using older penalty matrix due to being LQG last on 8/30/15

Penalty: \$9,210

Multiday: 123 days x \$1,295 = \$159,285

Total = \$168,495

Discuss multi-day # if we want to bring total penalty # down

Dropping due to fluctuation in generator status, PA regs state to notify, "unless temporarily"

RCRA-C VIOLATION COUNT II

FACILITY NAME:

Dial Corporation
125 Jaycee Drive
West Hazelton, PA 18201

VIOLATION:

Failure to submit subsequent notification under RCRA 3010 as a Large Quantity Generator [25 PA 262a.12(b)(1)]

HOW FACILITY VIOLATED REGULATION:

A. Facility failed to submit subsequent notification using EPA Form 8700-12 to the state to notify them of their change to LQG status during many throughout 2013, 2014, and 2015. Large basis of RCRA program

SUPPORTING EVIDENCE:

- A. RCRA Info no notification updates
 - a. State representative confirm
 - b. Facility representative confirm

Potential for Harm: Moderate Extent of Deviation: Moderate

Penalty: \$10,602

RCRA-C VIOLATION - COUNT II

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to submit Biennial Report [40 CFR 262.41]

HOW FACILITY VIOLATED REGULATION:

A. Facility failed to submit a Biennial Report documenting HW generation during years 2013 and 2015 (Deadline was March 2014 and March 2016)

SUPPORTING EVIDENCE:

- A. RCRA Info No BR records
 - a. Facility rep confirmation + no records on site

Potential for Harm: Moderate Extent of Deviation: Moderate

Old penalty matrix # for March 2014, New penalty matrix # for March 2016

Penalty: \$9,210 + \$10,602

Total: \$19,812

Dropping, due to training records appearing to be adequate

RCRA-C VIOLATION COUNT IV

FACILITY NAME:

Dial Corporation
125 Jaycee Drive
West Hazelton, PA 18201

VIOLATION:

Failure to provide adequate training to employees responsible for handling HW [40 CFR 265.16(a)]

HOW FACILITY VIOLATED THE REGULATION:

- A. Facility failed to provide RCRA HW training to employees conducting HWAA weekly inspections
 - a. Facility provided documentation of a Hazardous Communication / Global Harmonization training. Unsure as to whether it included RCRA topics.

SUPPORTING EVIDENCE:

A. Facility follow-up documents—haz. com./global harmonization training, no RCRA specific—may meet requirements.—Inspection observations, inadequate RCRA training led to operation under incorrect generator status

Potential for Harm: Moderate Extent of Deviation: Minor

RCRA-C VIOLATION - COUNT III

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to provide a home address for Emergency Coordinator within Contingency Plan [40 CFR 265.52(d)]

HOW FACILITY VIOLATED THE REGULATION:

A. Home address of designated Emergency Coordinator not listed within the Facility's Contingency Plan

SUPPORTING EVIDENCE:

A. Copy of Facility's Emergency Response Plan, Attachment G of Inspection Report

Old penalty matrix #, last time LQG was 8/30/15

Potential for Harm: Minor Extent of Deviation: Minor

RCRA-C VIOLATION - COUNT IV

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to provide copies of Facility Contingency Plan to local authorities [40 CFR 265.53]

HOW FACILITY VIOLATED REGULATION:

A. Facility failed to send copies of its CP to local authorities

SUPPORTING EVIDENCE:

- A. Facility follow-up response stating that they have a good working relationship with local authorities, but did not send them the CP since they operate an as SQG
 - a. Lack of documentation to show CP was sent to local authorities

Old penalty matrix #, last time LQG was 8/30/15

Potential for Harm: Moderate Extent of Deviation: Minor

RCRA-C VIOLATION – COUNT V

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to keep container of HW closed [40 CFR 265.173]

HOW FACILITY VIOLATED THE REGULATION:

A. Facility failed to keep closed (2) satellite containers of aerosol cans managed as HW before they are taken to be punctured.

SUPPORTING EVIDENCE:

A. Insp. Rpt. pg 7, para. 3; Insp. Rpt. pg. 8, para. 5; Photo #14; Photo #26

Potential for Harm: Minor **Extent of Deviation: Minor**

RCRA-C VIOLATION - COUNT VI

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to contain UW lamps in secure, closed container [40 CFR 273.13(d)(1)]

HOW FACILITY VIOLATED THE REGULATION:

- A. UW lamp box was initially closed, Facility representative moved the box (slightly) to determine if it was labeled and the top of the cardboard ripped off instantly.
 - a. Not secure to prevent release

SUPPORTING EVIDENCE:

A. Insp. Rpt. pg. 8, para. 7; Photo #32

Potential for Harm: Minor Extent of Deviation: Minor

RCRA-C VIOLATION - COUNT VII

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to label UW lamp container [40 CFR 273.14(e)]

HOW FACILITY VIOLATED REGULATION:

A. UW lamp containers did not have visible labels. Universal Waste label was found, underneath the shipping label after Facility representative peeled shipping label back. Box for Universal Waste "lamps" was not checked off

SUPPORTING EVIDENCE:

A. Insp. Rpt. pg. 9, para. 1; Photo #33

Potential for Harm: Minor Extent of Deviation: Minor

RCRA-C VIOLATION - COUNT VIII

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to mark UW batteries with start accumulation date [40 CFR 273.15(c)]

HOW FACILITY VIOLATED THE REGULATION:

A. Facility contained UW batteries in a container that was not labeled with the start accumulation date

SUPPORTING EVIDENCE:

A. Insp. Rpt. pg. 9, para. 2; Photo #35

Potential for Harm: Minor Extent of Deviation: Minor

Penalty: \$489

Total: \$196,689

RCRA-C VIOLATION – COUNT I

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Operation of a treatment, disposal, or storage facility without a permit [40 CFR 270.1(b)] incorporates by reference [40 CFR 262.34]

HOW FACILITY VIOLATED REGULATION:

- A. Storage of HW for greater than 90 days
- B. Failure to keep closed SAA containers of HW
- C. Failure to provide home address of EC in Contingency Plan
- D. Failure to provide copies of CP to local authorities

SUPPORTING EVIDENCE:

- A. Manifest Information; See Manifest Info at end of Insp. Rpt. with highlighted areas
- B. Insp. Rpt. pg 7, para. 3; Insp. Rpt. pg. 8, para. 5; Photo #14; Photo #26
- C. Copy of Facility's Emergency Response Plan, Attachment G of Inspection Report
- D. Facility follow-up response stating that they have a good working relationship with local authorities, but did not send them the CP since they operate an as SQG
 - a. Lack of documentation to show CP was sent to local authorities

Potential for Harm: Moderate **Extent of Deviation: Moderate**

Using older penalty matrix due to being LQG last on 8/30/15

Penalty: \$9,210

Total = \$101,460

RCRA-C VIOLATION – COUNT II

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to submit Biennial Report [40 CFR 262.41]

HOW FACILITY VIOLATED REGULATION:

A. Facility failed to submit a Biennial Report documenting HW generation during years 2013 and 2015 (Deadline was March 2014 and March 2016)

SUPPORTING EVIDENCE:

- A. RCRA Info No BR records
 - a. Facility rep confirmation + no records on site

Potential for Harm: Minor Extent of Deviation: Major

Old penalty matrix # for March 2014, New penalty matrix # for March 2016

Penalty: \$4,250 + \$4,892

Total: \$9,142

RCRA-C VIOLATION - COUNT III

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to provide a home address for Emergency Coordinator within Contingency Plan [40 CFR 265.52(d)]

HOW FACILITY VIOLATED THE REGULATION:

A. Home address of designated Emergency Coordinator not listed within the Facility's Contingency Plan

SUPPORTING EVIDENCE:

A. Copy of Facility's Emergency Response Plan, Attachment G of Inspection Report

Old penalty matrix #, last time LQG was 8/30/15

Potential for Harm: Minor Extent of Deviation: Minor

RCRA-C VIOLATION - COUNT IV

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to provide copies of Facility Contingency Plan to local authorities [40 CFR 265.53]

HOW FACILITY VIOLATED REGULATION:

A. Facility failed to send copies of its CP to local authorities

SUPPORTING EVIDENCE:

- A. Facility follow-up response stating that they have a good working relationship with local authorities, but did not send them the CP since they operate an as SQG
 - a. Lack of documentation to show CP was sent to local authorities

Old penalty matrix #, last time LQG was 8/30/15

Potential for Harm: Moderate Extent of Deviation: Minor

RCRA-C VIOLATION - COUNT V

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to keep container of HW closed [40 CFR 265.173]

HOW FACILITY VIOLATED THE REGULATION:

A. Facility failed to keep closed (2) satellite containers of aerosol cans managed as HW before they are taken to be punctured.

SUPPORTING EVIDENCE:

A. Insp. Rpt. pg 7, para. 3; Insp. Rpt. pg. 8, para. 5; Photo #14; Photo #26

Potential for Harm: Minor Extent of Deviation: Minor

RCRA-C VIOLATION - COUNT VI

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to contain UW lamps in secure, closed container [40 CFR 273.13(d)(1)]

HOW FACILITY VIOLATED THE REGULATION:

- A. UW lamp box was initially closed, Facility representative moved the box (slightly) to determine if it was labeled and the top of the cardboard ripped off instantly.
 - a. Not secure to prevent release

SUPPORTING EVIDENCE:

A. Insp. Rpt. pg. 8, para. 7; Photo #32

Potential for Harm: Minor Extent of Deviation: Minor

RCRA-C VIOLATION - COUNT VII

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to label UW lamp container [40 CFR 273.14(e)]

HOW FACILITY VIOLATED REGULATION:

A. UW lamp containers did not have visible labels. Universal Waste label was found, underneath the shipping label after Facility representative peeled shipping label back. Box for Universal Waste "lamps" was not checked off

SUPPORTING EVIDENCE:

A. Insp. Rpt. pg. 9, para. 1; Photo #33

Potential for Harm: Minor Extent of Deviation: Minor

RCRA-C VIOLATION – COUNT VIII

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to mark UW batteries with start accumulation date [40 CFR 273.15(c)]

HOW FACILITY VIOLATED THE REGULATION:

A. Facility contained UW batteries in a container that was not labeled with the start accumulation date

SUPPORTING EVIDENCE:

A. Insp. Rpt. pg. 9, para. 2; Photo #35

Potential for Harm: Minor Extent of Deviation: Minor

Penalty: \$489

Total: \$118,984

RCRA-C VIOLATION - COUNT I

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Operation of a treatment, disposal, or storage facility without a permit [40 CFR 270.1(b)] incorporates by reference [40 CFR 262.34]

HOW FACILITY VIOLATED REGULATION:

- A. Storage of HW for greater than 90 days
- B. Failure to keep closed SAA containers of HW
- C. Failure to provide home address of EC in Contingency Plan
- D. Failure to provide copies of CP to local authorities

SUPPORTING EVIDENCE:

- A. Manifest Information; See Manifest Info at end of Insp. Rpt. with highlighted areas
- B. Insp. Rpt. pg 7, para. 3; Insp. Rpt. pg. 8, para. 5; Photo #14; Photo #26
- C. Copy of Facility's Emergency Response Plan, Attachment G of Inspection Report
- D. Facility follow-up response stating that they have a good working relationship with local authorities, but did not send them the CP since they operate an as SQG
 - a. Lack of documentation to show CP was sent to local authorities

Potential for Harm: Moderate Extent of Deviation: Moderate

Using older penalty matrix due to being LQG last on 8/30/15

Penalty: \$9,210

Multiday: 31 days x \$750 = \$23,250

Total = \$32,460

RCRA-C VIOLATION - COUNT II

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to submit Biennial Report [40 CFR 262.41]

HOW FACILITY VIOLATED REGULATION:

A. Facility failed to submit a Biennial Report documenting HW generation during years 2013 and 2015 (Deadline was March 2014 and March 2016)

SUPPORTING EVIDENCE:

- A. RCRA Info No BR records
 - a. Facility rep confirmation + no records on site

Potential for Harm: Minor Extent of Deviation: Major

Old penalty matrix # for March 2014, New penalty matrix # for March 2016

Penalty: \$4,250 + \$4,892

Total: \$9,142

RCRA-C VIOLATION - COUNT III

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to provide copies of Facility Contingency Plan to local authorities [40 CFR 265.53]

HOW FACILITY VIOLATED REGULATION:

A. Facility failed to send copies of its CP to local authorities

SUPPORTING EVIDENCE:

- A. Facility follow-up response stating that they have a good working relationship with local authorities, but did not send them the CP since they operate an as SQG
 - a. Lack of documentation to show CP was sent to local authorities

Old penalty matrix #, last time LQG was 8/30/15

Potential for Harm: Moderate Extent of Deviation: Minor

RCRA-C VIOLATION - COUNT IV

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to keep container of HW closed [40 CFR 265.173]

HOW FACILITY VIOLATED THE REGULATION:

A. Facility failed to keep closed (2) satellite containers of aerosol cans managed as HW before they are taken to be punctured.

SUPPORTING EVIDENCE:

A. Insp. Rpt. pg 7, para. 3; Insp. Rpt. pg. 8, para. 5; Photo #14; Photo #26

Potential for Harm: Minor **Extent of Deviation: Minor**

RCRA-C VIOLATION - COUNT V

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to contain UW lamps in secure, closed container [40 CFR 273.13(d)(1)]

HOW FACILITY VIOLATED THE REGULATION:

- A. UW lamp box was initially closed, Facility representative moved the box (slightly) to determine if it was labeled and the top of the cardboard ripped off instantly.
 - a. Not secure to prevent release

SUPPORTING EVIDENCE:

A. Insp. Rpt. pg. 8, para. 7; Photo #32

Potential for Harm: Minor Extent of Deviation: Minor

RCRA-C VIOLATION - COUNT VI

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to label UW lamp container [40 CFR 273.14(e)]

HOW FACILITY VIOLATED REGULATION:

A. UW lamp containers did not have visible labels. Universal Waste label was found, underneath the shipping label after Facility representative peeled shipping label back. Box for Universal Waste "lamps" was not checked off

SUPPORTING EVIDENCE:

A. Insp. Rpt. pg. 9, para. 1; Photo #33

Potential for Harm: Minor Extent of Deviation: Minor

RCRA-C VIOLATION - COUNT VII

FACILITY NAME:

Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

VIOLATION:

Failure to mark UW batteries with start accumulation date [40 CFR 273.15(c)]

HOW FACILITY VIOLATED THE REGULATION:

A. Facility contained UW batteries in a container that was not labeled with the start accumulation date

SUPPORTING EVIDENCE:

A. Insp. Rpt. pg. 9, para. 2; Photo #35

Potential for Harm: Minor Extent of Deviation: Minor

Penalty: \$489

Total: \$49,554

10% discount = \$44,598



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

1650 Arch Street Philadelphia, Pennsylvania 19103-2029

VIA UPS OVERNIGHT DELIVERY

MAY 0 4 2017

Terry Hartlage Plant Manager Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

Re: Dial Corporation

EPA ID No. PAD987271012 Request to Show Cause

Dear Ms. Hartlage:

This letter is a follow-up to a compliance evaluation inspection conducted at the Dial Corporation facility located at 125 Jaycee Drive, West Hazelton, Pennsylvania 18201 ("Facility") by duly authorized representatives of the U.S. Environmental Protection Agency ("EPA" or "Agency") on May 17, 2016. As a follow-up to the May 17, 2016 inspection, EPA requested additional information via email during the subsequent months, to which the Facility promptly responded via email. The purpose of the EPA inspection and subsequent requests for information was to determine compliance with the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. §§ 6901, et seq., the federal hazardous waste regulations set forth at 40 C.F.R. Parts 260-266, 268 and 270-273, and the authorized Pennsylvania Hazardous Waste Management Regulations (PaHWR), 25 Pa. Code Ch. 260a-266a, 266b, and 268a-270a.

Pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), and 40 C.F.R. Part 271, Subpart A, EPA authorized the Commonwealth of Pennsylvania to administer the PaHWR, *in lieu* of the federal hazardous waste management program established under RCRA Subtitle C, 42 U.S.C. §§ 6921-6939e. The PaHWR became effective on January 30, 1986, and were revised on November 27, 2000, March 22, 2004 and June 29, 2009, and contain certain provisions implementing the Hazardous and Solid Waste Amendments ("HSWA") enacted on November 8, 1984 (Pub. Law No. 98-616), which amended Subtitle C of RCRA. The authorized provisions of the PaHWR codified at 25 Pa. Code Chapters 260a – 266c, 266b, and 268c – 270a, thereby became requirements of RCRA Subtitle C and enforceable by EPA pursuant to RCRA § 3008(a), 42 U.S.C. § 6928(a). See 51 Fed. Reg. 1791 (January 15, 1986), 65 Fed. Reg. 57734 (September 26, 2000), 69 Fed. Reg. 2674 (January 20, 2004) and 74 Fed. Reg. 19453 (April 29, 2009).

Section 3008(a) of RCRA authorizes EPA to take enforcement action whenever it is determined that a person is in violation of any requirement of EPA's regulations implementing

RCRA Subtitle C, or any regulation of a state hazardous waste program, such as PaHWR, which has been authorized by EPA. Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), authorizes the assessment of a civil penalty against any person who violates any requirement of Subtitle C of RCRA. Penalties are calculated in accordance with Section 3008(h) of RCRA, 42 U.S.C. § 6928(h), and the RCRA Civil Penalty Policy (June 2003) (Enclosure 1). Any person who violates any requirement of the authorized state management program and federal hazardous waste management regulations is subject to a penalty of up to \$25,000 for each day of violation, adjusted upwards to \$37,500 by the Civil Monetary Inflation Rule, 40 C.F.R. Part 19 (Inflation Adjusted Penalty Matrices - Enclosure 2). Based on EPA's review of the RCRA Civil Penalty Policy and the inflation adjustments, EPA has determined that a total penalty of \$118,984.00 is appropriate for the alleged violations. This proposed penalty does not constitute a "demand" as that term is defined in the Equal Access to Justice Act, 28 U.S.C. § 2412.

Based upon the information currently available to the Agency, EPA believes that there is a sufficient basis for the issuance of an Administrative Complaint against Dial Corporation seeking the assessment of a civil penalty and containing a Compliance Order requiring the Facility to comply with RCRA. Prior to issuing an Administrative Complaint, EPA is providing Dial Corporation with the opportunity to confer with EPA to show cause as to any reasons why an Administrative Complaint should not be issued for the violations identified below. EPA is also inviting Dial Corporation to meet with EPA in person or by conference call to discuss the possibility of entering into a settlement of the violations with the Agency without litigation.

I. EPA FINDINGS OF POSSIBLE RCRA VIOLATIONS

EPA has identified the following possible RCRA violations at your Facility:

Violation No. 1: Owning and/or Operating a Hazardous Waste Treatment, Storage or Disposal Facility without a Permit or Interim Status

Dial Corporation violated Section 3005(a) and (e) of RCRA, 42 U.S.C. § 6925(a) and (e), and 25 Pa. Code § 270a.1, which incorporates by reference the RCRA permit program requirements and provisions of 40 C.F.R. § 270.1(c), by operating a hazardous waste storage facility without a permit. Although Dial Corporation may have attempted to comply with the generator accumulation exemption to the permit requirements found at 40 C.F.R, § 262.34, which is incorporated by reference at 25 Pa. Code § 262a.1 of the PaHWR, Dial Corporation did not qualify for this exemption because of its failure to comply with all of the conditions for this exemption. The exemption conditions not met are described below.

A. Storage of Hazardous Waste for Over 90 Days. 25 Pa. Code § 262a.10 incorporates by reference the generator accumulation and permit exemption requirements and conditions of 40 C.F.R. § 262.34(a), which provides a generator may accumulate hazardous waste on site for 90 days or less without a permit or without having interim status. A review of Dial Corporation manifests showed it stored hazardous waste at its West Hazelton Facility without a permit for more than ninety (90) days. Dial Corporation began to accumulate two drums of D001 and F003 hazardous waste on April 26, 2013 but did not ship these hazardous waste drums offsite until August 5, 2013 on Manifest No.

Day 91 011073035. From July 25, 2013 until August 5, 2013, these two drums of hazardous waste were beyond the 90 day storage limit of the generator accumulation exemption and therefore, Dial Corporation was storing hazardous waste without a permit or applicable exemption to the permit requirement. Dial Corporation began to accumulate two drums of D001, D022 and F003 hazardous waste on June 18, 2014 but did not ship these hazardous waste drums offsite until December 23, 2014 on Manifest No. 007685113FLE. From September 16, 2014 until December 23, 2014, these two drums of hazardous waste were beyond the 90-day storage limit of the generator accumulation exemption and therefore, Dial Corporation was storing hazardous waste without a permit or applicable exemption to the permit requirement. Dial Corporation began to accumulate two drums of D001, D002, D022 and F003 hazardous waste on February 20, 2015 but did not ship these hazardous waste drums offsite until June 1, 2015 on Manifest No. 008210120FLE. From May 21, 2015 until June 1, 2015, Dial Corporation was storing hazardous waste without a permit or applicable exemption to the permit requirement.

B. Failure to Maintain a Complete Contingency Plan. 25 Pa. Code § 262a.10 incorporates by reference the generator accumulation and permit exemption requirements and conditions of 40 C.F.R. § 262.34(a)(4) and, by further reference, the Contingency Plan requirements of 40 C.F.R. §§ 265.52(d), which requires each facility to have a Contingency Plan that contains the name and address of the emergency coordinator. On August 30, 2015, the West Hazelton Facility Contingency Plan did not provide the home address of the person listed in the Facility Contingency Plan as the emergency coordinator.

C. Failure to Submit Copies of the Contingency Plan. 25 Pa. Code § 262a.10 incorporates by reference the generator accumulation and permit exemption requirements and conditions of 40 C.F.R. § 262.34(a)(4) and, by further reference, the Contingency Plan requirements of 40 C.F.R. §§ 265.53(b), which requires each facility to submit a copy of the Contingency Plan to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. On August 30, 2015, the West Hazelton Facility Contingency Plan had not

been submitted to local authorities. Genail on 8/19/16-attachment, not Sent because operated 98 SQG-from Terry Hartlage-Plant Mngr. D. Failure to Keep Containers of Hazardous Waste Closed. 25 Pa. Code § 262a.10 incorporates by reference the generator accumulation and permit exemption requirements and conditions of 40 C.F.R. § 262.34(a)(4) and, by further reference, 40 C.F.R. § 265.173(a), provides that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. At the time of the inspection on May 17, 2016, Dial Corporation was accumulating D001 and D003 hazardous waste aerosol cans in an open plastic container in its packaging area and in an open plastic container in its hazardous waste accumulation area. Dial Corporation was not adding or removing waste from these containers at the time of the inspection and therefore, these containers of hazardous waste did not meet the permit exemption requirements.

last time LQG >90 days inspection

>90 days On May 17, 2016, August 30, 2015, May 21, 2015-June 1, 2015, September 16, 2014-December 23, 2014, and July 25, 2013-August 5, 2013, Dial Corporation failed to satisfy the generator accumulation and permit exemption requirements and conditions set forth in 25 Pa. Code § 262a.10 which incorporates by reference the 40 C.F.R. § 262.34. Therefore, on the aforementioned dates, Dial Corporation owned and/or operated a hazardous waste storage facility without a permit or interim status in violation of Section 3005(a) and (e) of RCRA, 42 U.S.C. § 6925(a) and (e), and 25 Pa. Code § 270a.1, which incorporates by reference the RCRA permit program requirements and provisions of 40 C.F.R. § 270.1(c).

Proposed Penalty for Violation No. 1: \$101,460.00

Violation No. 2: Failure to Maintain a Complete Contingency Plan

25 Pa. Code § 264a.1 incorporates by reference the Contingency Plan requirements of 40 C.F.R. § 264.52(d), which requires each facility to have a Contingency Plan that contains the name and address of the emergency coordinator. On August 30, 2015, the West Hazelton Facility Contingency Plan did not provide the home address of the person listed in the Facility Contingency Plan as the emergency coordinator.

Proposed Penalty for Violation No. 2: \$430.00

Violation No. 3: Failure to Submit Copies of the Contingency Plan

25 Pa. Code § 264a.1 incorporates by reference the Contingency Plan requirements of 40 C.F.R. §§ 264.53(b), which requires each facility to submit a copy of the Contingency Plan to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. On August 30, 2015, the West Hazelton Facility Contingency Plan had not been submitted to local authorities.

Proposed Penalty for Violation No. 3: \$5,670.00

Violation No. 4: Failure to Keep Containers of Hazardous Waste Closed

25 Pa. Code § 264a.1 incorporates by reference the management of container requirements of 40 C.F.R. § 264.173(a), which requires that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. At the time of the inspection on May 17, 2016, Dial Corporation was accumulating D001 and D003 hazardous waste aerosol cans in an open plastic container in its packaging area and in an open plastic container in its hazardous waste accumulation area. Dial Corporation was not adding or removing waste from these containers at the time of the inspection and therefore, failed to properly manage these two containers of hazardous waste.

Proposed Penalty for Violation No. 4: \$815.00

Violation No. 5: Failure to File Biennial Report

25 Pa Code § 262a.41 provides that a generator who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must prepare and submit a single copy of a Biennial Report to the PADEP by March 1 of each even numbered year. At the time of the EPA inspection, Respondent had not filed the hazardous waste biennial reports due on March 1, 2014 and March 1, 2016. For reporting years 2013 2 2015

Proposed Penalty for Violation No. 4: \$9,142

Violation No. 6: Failure to Store Universal Waste Lamps in Closed Structurally Sound Container

25 Pa. Code § 266b.1, which incorporates by reference 40 C.F.R. § 273.13(d)(1), requires that a small quantity handler of universal waste, specifically, universal waste "lamps," store such lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. At the time of the inspection on May 17, 2016, Dial Corporation was storing universal waste lamps in a cardboard box that ripped open when the Facility representative moved the box to determine whether a label had been applied to the box. Dial Corporation violated 25 Pa. Code § 266b.1, which incorporates by reference 40 C.F.R. § 273.13(d)(1), by failing to store universal waste lamps in closed structurally sound container.

Proposed Penalty for Violation No. 6: \$489.00

Violation No. 7: Failure to Label Container of Universal Waste Lamps

25 Pa. Code § 266b.1, which incorporates by reference, 40 C.F.R. § 273.14(e), requires that, for small quantity handlers of universal waste lamps, each lamp or container or package containing such lamps, must be clearly marked or labeled with one of the following phrases: "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)." At the time of the inspection on May 17, 2016, Dial Corporation was storing universal waste lamps in a container that did not have a box checked for Universal Waste Lamps on its label nor did it have any other form of insignia to denote the storage of universal waste lamps in the container.

Proposed Penalty for Violation No. 7: \$489.00

Violation No. 8: Failure to Mark or Demonstrate Accumulation Start Date for Universal **Waste Batteries**

25 Pa. Code § 266b.1, which incorporates by reference 40 C.F.R. § 273.15(c), requires that a small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date that it becomes a waste or has been received. 40 C.F.R. § 273.15(c)(1) provides that the handler may

make this demonstration by placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received. 40 C.F.R. § 273.15(c)(2) though (6) provides that this demonstration may also be made by marking each individual item with the date that it becomes a waste, maintaining an inventory system that identifies the earliest date that items became waste, placing universal waste in specific accumulation areas that identify the earliest date that items became waste, or any other method that clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. At the time of the inspection on May 17, 2016, Dial Corporation had not marked nor was it able to identify an accumulation start date for a container of universal waste batteries.

Proposed Penalty for Violation No. 8: \$489.00

New Total \$49,98 REQUEST TO SHOW CAUSE II.

EPA has determined that the issuance of an Administrative Complaint seeking assessment of a civil penalty concerning the aforesaid violations and issuance of a Compliance Order requiring compliance with the PaHWR is the appropriate enforcement response in this matter.

Prior to issuing this Administrative Complaint, however, EPA is providing Dial Corporation the opportunity to confer with the Agency and show cause as to why an Administrative Complaint should not be issued by the Agency in this matter. EPA is requesting that Dial Corporation contact the Agency within fourteen (14) calendar days of receipt of this letter to discuss this matter. This opportunity will be made available at a meeting with EPA in Philadelphia on a mutually convenient date or by telephone conference. To facilitate settlement discussions and to supplement EPA's understanding of the compliance activities taken by Dial Corporation concerning these alleged violations, EPA requests that Dial Corporation submit such additional documentation which may be in its possession or control that identifies any and all measures taken to address the violations identified herein. If the compliance measures identified are planned or are on-going, please provide a schedule for when the compliance measures will be completed. Please send any and all supplemental information that you wish EPA representatives to review and consider in this matter to the attention of either:

> Rebecca Serfass U.S. Environmental Protection Agency, Region III Land and Chemicals Division (3LC32) 1650 Arch Street Philadelphia, Pennsylvania 19103

or

T. Chris Minshall
Sr. Assistant Regional Counsel
U.S. Environmental Protection Agency, Region III
Office of Regional Counsel (3RC30)
1650 Arch Street
Philadelphia, Pennsylvania 19103.

Please be advised, however, if this matter is not resolved within sixty (60) days after your receipt of this letter, EPA may proceed with the issuance of an Administrative Complaint.

If in the course of discussing this matter with the Agency, Dial Corporation intends to submit documents or information to EPA, please be advised that Dial Corporation is entitled to assert a claim of business confidentiality covering any part or all of the information Dial Corporation submits to EPA pursuant to this Request to Show Cause, in the manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a claim of business confidentiality is asserted at the time the information is submitted to EPA, EPA may make this information available to the public without further notice to Dial Corporation.

Dial Corporation must also include as part of any submission of information or documentation to EPA pursuant to this Request to Show Cause the following certification signed and dated by a responsible corporate officer of your corporation:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this response to Information Request and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining or compiling the information, I believe that the submitted information is true, accurate, and complete. I recognize that there are significant penalties for submitting false and/or misleading information, including the possibility of fine and/or imprisonment."

Signature:	
Printed Name:	
Title:	

This Request to Show Cause is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Additionally, please find enclosed a document entitled "Information Sheet" concerning Small Business Resources and the Small Business Regulatory Enforcement and Fairness Act ("SBREFA") (Enclosure 3). This enclosure provides information on contacting the SBREFA Ombudsman to comment on federal enforcement and compliance activities and also provides information on compliance assistance. As noted in the enclosure, any decision to participate in such program or to seek compliance assistance does not relieve Dial Corporation of its obligation to respond in a timely manner to an EPA enforcement action, create any rights or defenses under

law, and will not affect EPA's decision to pursue this enforcement action. To preserve Dial Corporation legal rights, Dial Corporation must comply with all rules governing the administrative enforcement process. The Ombudsman and fairness boards do not participate in the resolution of EPA's enforcement action.

Finally, please be advised that certain companies may be required to disclose to the Securities and Exchange Commission the existence of certain pending or known to be contemplated environmental legal proceedings (administrative or judicial) arising under Federal, State or local environmental laws. Please see the attached "Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings" for more information about this SEC requirement (Enclosure 4).

If you have any other questions concerning this matter, you may contact Ms. Rebecca Serfass of my staff at (215) 814-2047, or if your company is represented by counsel, please have him/her contact Mr. T. Chris Minshall, the attorney assigned to this matter, at (215) 814-2473.

Sincerely,

Carol Amend, Associate Director

Office of RCRA Programs

Enclosures

- 1) RCRA Civil Penalty Policy (June 2003)
- 2) Adjusted Penalty Policy Matrices (only the RCRA C revised penalty matrix and multiday penalty charts included)
- 3) SBREFA Information Sheet
- 4) Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings

cc: Rebecca Serfass (3LC32) T. Chris Minshall (3RC30)

Scott Eady, 1110 Nasa Parkway, Suite 470, Houston, TX 77085



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

1650 Arch Street Philadelphia, Pennsylvania 19103-2029

VIA UPS OVERNIGHT DELIVERY

MAY 0 4 2017

Terry Hartlage Plant Manager Dial Corporation 125 Jaycee Drive West Hazelton, PA 18201

Re: Dial Corporation

EPA ID No. PAD987271012 Request to Show Cause

Dear Ms. Hartlage:

This letter is a follow-up to a compliance evaluation inspection conducted at the Dial Corporation facility located at 125 Jaycee Drive, West Hazelton, Pennsylvania 18201 ("Facility") by duly authorized representatives of the U.S. Environmental Protection Agency ("EPA" or "Agency") on May 17, 2016. As a follow-up to the May 17, 2016 inspection, EPA requested additional information via email during the subsequent months, to which the Facility promptly responded via email. The purpose of the EPA inspection and subsequent requests for information was to determine compliance with the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. §§ 6901, et seq., the federal hazardous waste regulations set forth at 40 C.F.R. Parts 260-266, 268 and 270-273, and the authorized Pennsylvania Hazardous Waste Management Regulations (PaHWR), 25 Pa. Code Ch. 260a-266a, 266b, and 268a-270a.

Pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), and 40 C.F.R. Part 271, Subpart A, EPA authorized the Commonwealth of Pennsylvania to administer the PaHWR, *in lieu* of the federal hazardous waste management program established under RCRA Subtitle C, 42 U.S.C. §§ 6921-6939e. The PaHWR became effective on January 30, 1986, and were revised on November 27, 2000, March 22, 2004 and June 29, 2009, and contain certain provisions implementing the Hazardous and Solid Waste Amendments ("HSWA") enacted on November 8, 1984 (Pub. Law No. 98-616), which amended Subtitle C of RCRA. The authorized provisions of the PaHWR codified at 25 Pa. Code Chapters 260a – 266c, 266b, and 268c – 270a, thereby became requirements of RCRA Subtitle C and enforceable by EPA pursuant to RCRA § 3008(a), 42 U.S.C. § 6928(a). See 51 Fed. Reg. 1791 (January 15, 1986), 65 Fed. Reg. 57734 (September 26, 2000), 69 Fed. Reg. 2674 (January 20, 2004) and 74 Fed. Reg. 19453 (April 29, 2009).

Section 3008(a) of RCRA authorizes EPA to take enforcement action whenever it is determined that a person is in violation of any requirement of EPA's regulations implementing

RCRA Subtitle C, or any regulation of a state hazardous waste program, such as PaHWR, which has been authorized by EPA. Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), authorizes the assessment of a civil penalty against any person who violates any requirement of Subtitle C of RCRA. Penalties are calculated in accordance with Section 3008(h) of RCRA, 42 U.S.C. § 6928(h), and the RCRA Civil Penalty Policy (June 2003) (Enclosure 1). Any person who violates any requirement of the authorized state management program and federal hazardous waste management regulations is subject to a penalty of up to \$25,000 for each day of violation, adjusted upwards to \$37,500 by the Civil Monetary Inflation Rule, 40 C.F.R. Part 19 (Inflation Adjusted Penalty Matrices - Enclosure 2). Based on EPA's review of the RCRA Civil Penalty Policy and the inflation adjustments, EPA has determined that a total penalty of \$118,984.00 is appropriate for the alleged violations. This proposed penalty does not constitute a "demand" as that term is defined in the Equal Access to Justice Act, 28 U.S.C. § 2412.

Based upon the information currently available to the Agency, EPA believes that there is a sufficient basis for the issuance of an Administrative Complaint against Dial Corporation seeking the assessment of a civil penalty and containing a Compliance Order requiring the Facility to comply with RCRA. Prior to issuing an Administrative Complaint, EPA is providing Dial Corporation with the opportunity to confer with EPA to show cause as to any reasons why an Administrative Complaint should not be issued for the violations identified below. EPA is also inviting Dial Corporation to meet with EPA in person or by conference call to discuss the possibility of entering into a settlement of the violations with the Agency without litigation.

I. EPA FINDINGS OF POSSIBLE RCRA VIOLATIONS

EPA has identified the following possible RCRA violations at your Facility:

Violation No. 1: Owning and/or Operating a Hazardous Waste Treatment, Storage or Disposal Facility without a Permit or Interim Status

Dial Corporation violated Section 3005(a) and (e) of RCRA, 42 U.S.C. § 6925(a) and (e), and 25 Pa. Code § 270a.1, which incorporates by reference the RCRA permit program requirements and provisions of 40 C.F.R. § 270.1(c), by operating a hazardous waste storage facility without a permit. Although Dial Corporation may have attempted to comply with the generator accumulation exemption to the permit requirements found at 40 C.F.R, § 262.34, which is incorporated by reference at 25 Pa. Code § 262a.1 of the PaHWR, Dial Corporation did not qualify for this exemption because of its failure to comply with all of the conditions for this exemption. The exemption conditions not met are described below.

A. Storage of Hazardous Waste for Over 90 Days. 25 Pa. Code § 262a.10 incorporates by reference the generator accumulation and permit exemption requirements and conditions of 40 C.F.R. § 262.34(a), which provides a generator may accumulate hazardous waste on site for 90 days or less without a permit or without having interim status. A review of Dial Corporation manifests showed it stored hazardous waste at its West Hazelton Facility without a permit for more than ninety (90) days. Dial Corporation began to accumulate two drums of D001 and F003 hazardous waste on April 26, 2013 but did not ship these hazardous waste drums offsite until August 5, 2013 on Manifest No.

o11073035. From July 25, 2013 until August 5, 2013, these two drums of hazardous waste were beyond the 90 day storage limit of the generator accumulation exemption and therefore, Dial Corporation was storing hazardous waste without a permit or applicable exemption to the permit requirement. Dial Corporation began to accumulate two drums of D001, D022 and F003 hazardous waste on June 18, 2014 but did not ship these hazardous waste drums offsite until December 23, 2014 on Manifest No. 007685113FLE. From September 16, 2014 until December 23, 2014, these two drums of hazardous waste were beyond the 90-day storage limit of the generator accumulation exemption and therefore, Dial Corporation was storing hazardous waste without a permit or applicable exemption to the permit requirement. Dial Corporation began to accumulate two drums of D001, D002, D022 and F003 hazardous waste on February 20, 2015 but did not ship these hazardous waste drums offsite until June 1, 2015 on Manifest No. 008210120FLE. From May 21, 2015 until June 1, 2015, Dial Corporation was storing hazardous waste without a permit or applicable exemption to the permit requirement.

- B. Failure to Maintain a Complete Contingency Plan. 25 Pa. Code § 262a.10 incorporates by reference the generator accumulation and permit exemption requirements and conditions of 40 C.F.R. § 262.34(a)(4) and, by further reference, the Contingency Plan requirements of 40 C.F.R. §§ 265.52(d), which requires each facility to have a Contingency Plan that contains the name and address of the emergency coordinator. On August 30, 2015, the West Hazelton Facility Contingency Plan did not provide the home address of the person listed in the Facility Contingency Plan as the emergency coordinator.
- C. Failure to Submit Copies of the Contingency Plan. 25 Pa. Code § 262a.10 incorporates by reference the generator accumulation and permit exemption requirements and conditions of 40 C.F.R. § 262.34(a)(4) and, by further reference, the Contingency Plan requirements of 40 C.F.R. §§ 265.53(b), which requires each facility to submit a copy of the Contingency Plan to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. On August 30, 2015, the West Hazelton Facility Contingency Plan had not been submitted to local authorities.
- D. Failure to Keep Containers of Hazardous Waste Closed. 25 Pa. Code § 262a.10 incorporates by reference the generator accumulation and permit exemption requirements and conditions of 40 C.F.R. § 262.34(a)(4) and, by further reference, 40 C.F.R. § 265.173(a), provides that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. At the time of the inspection on May 17, 2016, Dial Corporation was accumulating D001 and D003 hazardous waste aerosol cans in an open plastic container in its packaging area and in an open plastic container in its hazardous waste accumulation area. Dial Corporation was not adding or removing waste from these containers at the time of the inspection and therefore, these containers of hazardous waste did not meet the permit exemption requirements.

On May 17, 2016, August 30, 2015, May 21, 2015-June 1, 2015, September 16, 2014-December 23, 2014, and July 25, 2013-August 5, 2013, Dial Corporation failed to satisfy the generator accumulation and permit exemption requirements and conditions set forth in 25 Pa. Code § 262a.10 which incorporates by reference the 40 C.F.R. § 262.34. Therefore, on the aforementioned dates, Dial Corporation owned and/or operated a hazardous waste storage facility without a permit or interim status in violation of Section 3005(a) and (e) of RCRA, 42 U.S.C. § 6925(a) and (e), and 25 Pa. Code § 270a.1, which incorporates by reference the RCRA permit program requirements and provisions of 40 C.F.R. § 270.1(c).

Proposed Penalty for Violation No. 1: \$101,460.00

Violation No. 2: Failure to Maintain a Complete Contingency Plan

25 Pa. Code § 264a.1 incorporates by reference the Contingency Plan requirements of 40 C.F.R. § 264.52(d), which requires each facility to have a Contingency Plan that contains the name and address of the emergency coordinator. On August 30, 2015, the West Hazelton Facility Contingency Plan did not provide the home address of the person listed in the Facility Contingency Plan as the emergency coordinator.

Proposed Penalty for Violation No. 2: \$430.00

Violation No. 3: Failure to Submit Copies of the Contingency Plan

25 Pa. Code § 264a.1 incorporates by reference the Contingency Plan requirements of 40 C.F.R. §§ 264.53(b), which requires each facility to submit a copy of the Contingency Plan to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. On August 30, 2015, the West Hazelton Facility Contingency Plan had not been submitted to local authorities.

Proposed Penalty for Violation No. 3: \$5,670.00

Violation No. 4: Failure to Keep Containers of Hazardous Waste Closed

25 Pa. Code § 264a.1 incorporates by reference the management of container requirements of 40 C.F.R. § 264.173(a), which requires that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. At the time of the inspection on May 17, 2016, Dial Corporation was accumulating D001 and D003 hazardous waste aerosol cans in an open plastic container in its packaging area and in an open plastic container in its hazardous waste accumulation area. Dial Corporation was not adding or removing waste from these containers at the time of the inspection and therefore, failed to properly manage these two containers of hazardous waste.

Proposed Penalty for Violation No. 4: \$815.00

Violation No. 5: Failure to File Biennial Report

25 Pa Code § 262a.41 provides that a generator who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must prepare and submit a single copy of a Biennial Report to the PADEP by March 1 of each even numbered year. At the time of the EPA inspection, Respondent had not filed the hazardous waste biennial reports due on March 1, 2014 and March 1, 2016.

Proposed Penalty for Violation No. 4: \$9,142

Violation No. 6: Failure to Store Universal Waste Lamps in Closed Structurally Sound Container

25 Pa. Code § 266b.1, which incorporates by reference 40 C.F.R. § 273.13(d)(1), requires that a small quantity handler of universal waste, specifically, universal waste "lamps," store such lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. At the time of the inspection on May 17, 2016, Dial Corporation was storing universal waste lamps in a cardboard box that ripped open when the Facility representative moved the box to determine whether a label had been applied to the box. Dial Corporation violated 25 Pa. Code § 266b.1, which incorporates by reference 40 C.F.R. § 273.13(d)(1), by failing to store universal waste lamps in closed structurally sound container.

Proposed Penalty for Violation No. 6: \$489.00

Violation No. 7: Failure to Label Container of Universal Waste Lamps

25 Pa. Code § 266b.1, which incorporates by reference, 40 C.F.R. § 273.14(e), requires that, for small quantity handlers of universal waste lamps, each lamp or container or package containing such lamps, must be clearly marked or labeled with one of the following phrases: "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)." At the time of the inspection on May 17, 2016, Dial Corporation was storing universal waste lamps in a container that did not have a box checked for Universal Waste Lamps on its label nor did it have any other form of insignia to denote the storage of universal waste lamps in the container.

Proposed Penalty for Violation No. 7: \$489.00

Violation No. 8: Failure to Mark or Demonstrate Accumulation Start Date for Universal Waste Batteries

25 Pa. Code § 266b.1, which incorporates by reference 40 C.F.R. § 273.15(c), requires that a small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date that it becomes a waste or has been received. 40 C.F.R. § 273.15(c)(1) provides that the handler may

make this demonstration by placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received. 40 C.F.R. § 273.15(c)(2) though (6) provides that this demonstration may also be made by marking each individual item with the date that it becomes a waste, maintaining an inventory system that identifies the earliest date that items became waste, placing universal waste in specific accumulation areas that identify the earliest date that items became waste, or any other method that clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. At the time of the inspection on May 17, 2016, Dial Corporation had not marked nor was it able to identify an accumulation start date for a container of universal waste batteries.

Proposed Penalty for Violation No. 8: \$489.00

II. REQUEST TO SHOW CAUSE

EPA has determined that the issuance of an Administrative Complaint seeking assessment of a civil penalty concerning the aforesaid violations and issuance of a Compliance Order requiring compliance with the PaHWR is the appropriate enforcement response in this matter.

Prior to issuing this Administrative Complaint, however, EPA is providing Dial Corporation the opportunity to confer with the Agency and show cause as to why an Administrative Complaint should not be issued by the Agency in this matter. EPA is requesting that Dial Corporation contact the Agency within fourteen (14) calendar days of receipt of this letter to discuss this matter. This opportunity will be made available at a meeting with EPA in Philadelphia on a mutually convenient date or by telephone conference. To facilitate settlement discussions and to supplement EPA's understanding of the compliance activities taken by Dial Corporation concerning these alleged violations, EPA requests that Dial Corporation submit such additional documentation which may be in its possession or control that identifies any and all measures taken to address the violations identified herein. If the compliance measures identified are planned or are on-going, please provide a schedule for when the compliance measures will be completed. Please send any and all supplemental information that you wish EPA representatives to review and consider in this matter to the attention of either:

Rebecca Serfass
U.S. Environmental Protection Agency, Region III
Land and Chemicals Division (3LC32)
1650 Arch Street
Philadelphia, Pennsylvania 19103

or

T. Chris Minshall
Sr. Assistant Regional Counsel
U.S. Environmental Protection Agency, Region III
Office of Regional Counsel (3RC30)
1650 Arch Street
Philadelphia, Pennsylvania 19103.

Please be advised, however, if this matter is not resolved within sixty (60) days after your receipt of this letter, EPA may proceed with the issuance of an Administrative Complaint.

If in the course of discussing this matter with the Agency, Dial Corporation intends to submit documents or information to EPA, please be advised that Dial Corporation is entitled to assert a claim of business confidentiality covering any part or all of the information Dial Corporation submits to EPA pursuant to this Request to Show Cause, in the manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a claim of business confidentiality is asserted at the time the information is submitted to EPA, EPA may make this information available to the public without further notice to Dial Corporation.

Dial Corporation must also include as part of any submission of information or documentation to EPA pursuant to this Request to Show Cause the following certification signed and dated by a responsible corporate officer of your corporation:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this response to Information Request and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining or compiling the information, I believe that the submitted information is true, accurate, and complete. I recognize that there are significant penalties for submitting false and/or misleading information, including the possibility of fine and/or imprisonment."

Signature:	
Printed Name:	
Title:	

This Request to Show Cause is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Additionally, please find enclosed a document entitled "Information Sheet" concerning Small Business Resources and the Small Business Regulatory Enforcement and Fairness Act ("SBREFA") (Enclosure 3). This enclosure provides information on contacting the SBREFA Ombudsman to comment on federal enforcement and compliance activities and also provides information on compliance assistance. As noted in the enclosure, any decision to participate in such program or to seek compliance assistance does not relieve Dial Corporation of its obligation to respond in a timely manner to an EPA enforcement action, create any rights or defenses under

law, and will not affect EPA's decision to pursue this enforcement action. To preserve Dial Corporation legal rights, Dial Corporation must comply with all rules governing the administrative enforcement process. The Ombudsman and fairness boards do not participate in the resolution of EPA's enforcement action.

Finally, please be advised that certain companies may be required to disclose to the Securities and Exchange Commission the existence of certain pending or known to be contemplated environmental legal proceedings (administrative or judicial) arising under Federal, State or local environmental laws. Please see the attached "Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings" for more information about this SEC requirement (Enclosure 4).

If you have any other questions concerning this matter, you may contact Ms. Rebecca Serfass of my staff at (215) 814-2047, or if your company is represented by counsel, please have him/her contact Mr. T. Chris Minshall, the attorney assigned to this matter, at (215) 814-2473.

Sincerely,

Carol Amend, Associate Director

Office of RCRA Programs

Enclosures

- 1) RCRA Civil Penalty Policy (June 2003)
- 2) Adjusted Penalty Policy Matrices (only the RCRA C revised penalty matrix and multi-day penalty charts included)
- 3) SBREFA Information Sheet
- 4) Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings

cc: Rebecca Serfass (3LC32)
T. Chris Minshall (3RC30)
Scott Eady, 1110 Nasa Parkway, Suite 470, Houston, TX 77085

Dial Corp.	7/19/17
H.) Closed HW	drums -
adding	olrums - when actively
photo. ~8G	in maintenance punctioned.
drum. NOT	punctured.
5) BR - 2015. Submitt	2 2013 BR
Supmitt	(0) on 1/11/11
6) UN - HOZ. (IN mingmit Plan
at Site r	iow. Area now
box to be	day HWAA. Kept closed.
Auditing cycles	e on rolling basis

Facility Penalty Calculation Count I: 90 day storage Protential for harm: human hearth understand threat to program. moderate/moderate bottom \$ 7,090 mod/mod per day 31 days excess 31 x \$360 = \$11,160 - \$18,250 No adjustments to other counts Nots,000 proposed paralty from Facility. -Looked (a) Similar Situations to Compare from press releases. Gubilant Cadista comparison.

2014 event manifest from 9/18/14 Corrective actions has been identified. Notice to State for LQG. weekly insp.'s - Small centainers from lab equip. how being emphed into I- SAA drum into the Plamm. cabinet, then to 90 day area. S back loading dock near UW Storage. 3.) Training - Updated training gave records 3.) OP - updated, provided notif.

Show Cause Meeting 7/19/17 with Dial Corporation David Rockman-attorney Scott Eady - SHE Director for N. America came in in March and started getting hold on Status of W. Hazloton facility - generally making kest effort had guidance from someone about episodic/some misunderstandings. 2 drums area. - inspected on daily basis recorded - in flammable cabinet - how it's generated, only 1 drum over 90 instead of 2

Serfass, Rebecca

From:

Serfass, Rebecca

Sent:

Monday, May 01, 2017 12:06 PM

To:

Minshall, Chris

Subject:

Dial Corp - greater than 90 day storage dates

Hi Chris,

Per your request: storage violation dates

Start Accumulation	Shipped Off	<u>Day 91</u>	Waste Code(s)	Manifest Number	<u>Drums</u>	<u>Days ov€</u> <u>90</u>
4/26/2013	8/5/2013	7/25/2013	D001, F003	011073035	2 DR	12
6/18/2014	//12/23/2014	9/16/2014	D001, D022, F003	007685113 FLE	2 DR	99
2/20/2015	6/1/2015	5/21/2015	D001, D002, D022, F003	008210120 FLE	2 DR	12

This becomes a seperate instances of 2 days and 5 days = [31]

Periods of violation begin on day 91, noted above, through the shipped off date. Additional manifest details, if needed, can be found in the spreadsheet I sent. Let me know if you have any other questions. Thanks!

Best,

Rebecca Serfass

RCRA Waste Branch Land and Chemicals Division 1650 Arch Street (3LC32) Philadelphia, PA 19103-2029

(p): 215-814-2047

(e): serfass.rebecca@epa.gov

THINTED STATES TO NAME AND THE CHOOSE OF THE

Status	Status Info	Status Info	Status Info			
Status	Status Info	Status Info	Status Info			9
Status	Status Info	Status Info	Status Info			6
tus	tus Info	tus Info	itus Info	210	2	0
	Info	Info	Info	Sni		פנים

Exceedance Days

Aug-12 Sep-12 Oct-12 Nov-12 Dec-12	Jun-12 Jul-12	Mar-12 Apr-12 May-12	Month Jan-12 Feb-12
\$Q6 \$Q6 \$Q6 \$Q6	sage s	sog sog sog	Status SQG SQG
		2/20/2015	Start Accumulation 4/26/2013 6/18/2014
3785kg of waste		6/1/2015	Shipped Off 8/5/2013 12/23/2014
~3785kg of waste generated in August disposed of on 9/4/16	<u>Last time Facility was LQG</u> 8/30/2015	D001, D002, D022, F003	Waste Code(s) D001, F003 D001, D022, F003
of on 9/4/16	was LQG 15	+ 008210120 FLE 2 DR + 008210120 FLE 1 DR	Manifest Number 011073035 007685113 FLE
		2 DR 4 DR	Drums 2 DR 2 DR
		12	<u>Days over 90</u> 12 99

Jan-13
Feb-13
Mar-13
Apr-13
Jun-13
Jul-13
Aug-13
Sep-13
Oct-13
Nov-13

Jan-14 Feb-14 Mar-14 Apr-14 May-14

908 108 108 108

May-16	Apr-16	Mar-16	Feb-16	Jan-16	Dec-15	Nov-15	Oct-15	Sep-15	Aug-15	Jul-15	Jun-15	May-15	Apr-15	Mar-15	Feb-15	Jan-15	Dec-14	Nov-14	Oct-14	Sep-14	Aug-14	Jul-14	Jun-14
SQG	LQG	LQG	SQG	LQG	LQG	SQG	SQG	LQG	SQG	LQG	LQG	SQG	LQG	SQG	SQG	LQG							

110		Igned for use on elite (12-pitch) typewriter.)	100 4 (100	Grup	D.	14 14 14 11		Approved.	OMB No. 2	2050-0039
1	UNIFORM HAZARDOUS		2. Page 1 of 3. En			4. Manifest	Tracking Nu	mber	A	
Ш	WASTE MANIFEST	PAD 987 271 012	1 8	00-851-71	156	1 01	339	665	ს ე კ	IK
Ш	5. Generator's Name and Mail	ling Address DIAL CORPORATION	, F Gener	rator's Site Address	(if different th	nan mailing addres	ss)	-		
П			£ .			3				
П		125 JAYCEE DRIVE								
Ш		WEST HAZLETON, P	A 18202							
П	Generator's Phone:	670-455-9980								
Ш	6. Transporter 1 Company Na	me				U.S. EPA ID N	Number			2
Ш	2	ELK TRANSPORTAT	ION, INC.			10	4D 987	7 971 (120	
Ш	7. Transporter 2 Company Na					U.S. EPA ID N		Sec. 7 1 %	7.5e. 67	
Ш	3 123					1				
Ш	Designated Facility Name a	and Cita Addrson								
Н	o. Designated Facility Name a	GIANT RESOURCE I	RECOVERY - SUM	TER. INC.		U.S. EPA ID N	Number			
Ш		755 INDUSTRIAL RO	AD				ch other in an a			
П		SUMTER SC 29150				59	CD 036	5 2/0 t	320	
П	Facility's Phone:	803-773-1400				1				
П	9a. 9b. U.S. DOT Descrip	otion (including Proper Shipping Name, Hazard Class, II	Number	10. Contain	1070	·	I I			
Ш	HM and Packing Group (if	fanv))	7 Number,			11. Total Quantity	12. Unit Wt./Vol.	13. V	Vaste Codes	3
П	1.			No.	Туре	Quantity	WL/VOI.			
8	RO UNI	1993, Waste Flammable Liq	uside nae					0001	F003	
١ĕ	W.	,		XXX	8.00	120115	1	Paralle I	1000	
18	(menth)	sobutyl Ketone, Ethanol), 3	, ruii	VVV	Dill	MILO	6			
GENERATOR	2.	ODE MAN EL	ula. A.		6.1314		1	40		5.
छ	The state of the s	1 325 Waste Flammable So	Control of the Contro	-1	Carry			9994		
П	nos (li	sopropanol) 4.1 PGH	4.	9"	TP.					
П	3.		**		-				-	
П	J.,									
П		8 S 18					l t	+		
П						-				
П	4.									
П							1 1			
П										
П	14. Special Handling Instruction	ons and Additional Information								
П		(MIXED SOLVENTS - MIBK & E	THANK'SI'I AN	proval# 11	7660					
П	b)-ERG# 133	(Esterqual-Solids) ()	The service of the se	Sea on A contract to the	4.246		Bill to: 1	- 192 V		.a. 1
П	and and the state of the state of	fragan dame aguant								
П								915A4/		
П	15. GENERATOR'S/OFFER	OR'S CERTIFICATION: I hereby declare that the cont arded, and are in all respects in proper condition for tra	ents of this consignment are fully	and accurately de	scribed above	by the proper shi	ipping name,	and are class	sified, packa	ged,
П	Exporter, I certify that the	e contents of this consignment conform to the terms of the	he attached EPA Acknowledome	nt of Consent	onai governm	ientai regulations.	if export snip	ment and I a	m the Prima	ry
П	I certify that the waste mi	inimization statement identified in 40 CFR 262.27(a) (if	I am a large quantity generator)	or (b) (if I am a sma	Il quantity ger	nerator) is true.				
	Generator's/Offeror's Printed/T	yped Name	Signature	-	extens.	,		Mon	th Day	Year
1	JOHN 3	Swefz_	1 7	and the second	2	and the second		10	91/8	114
L	16. International Shipments			/					.17	1.1
Ιz	Transporter signature (for expe	Import to U.S.	Export from U.S.	Port of en	,		-			
2	17. Transporter Acknowledgme			Date leavi	ig 0.3					
TRANSPORTER	Transporter 1 Printed/Typed Na		Signature					Mari	b D	
ğ	16 n 141	avenzuhn	Oigridiore	Service Courses a course of the course of th	· marketon in the con-	and the same of th		Mont	h Day	Year
ŝ	Transporter 2 Printed/Typed Na		Older	-Carrier -	1.1	-		0	7110	
RA	Transporter E i fillioù i ypoù fa		Signature					Mon	h Day	Year
느	10.01									
1	18. Discrepancy					8				
Ш	18a. Discrepancy Indication Sp	pace Quantity	Туре	Residue		Partial Reje	ection		Full Reje	ction
Ш		g ta "I" e					500011	_		Cuon
1				Manifest Reference	Number:					
≱	18b. Alternate Facility (or Gene	erator)				U.S. EPA ID N	lumber			
릇										
FA	Facility's Phone:					1				
ü	18c. Signature of Alternate Fac	cility (or Generator)			-			Mor	th Day	Veer
ATI				Tax y			1	Mor	th Day	Year
DESIGNATED FACILITY	10 Hazardaua Masta Dana 11	Apparament Method Codes II - 11 - 11								
ESI		Management Method Codes (i.e., codes for hazardous		ecycling systems)						
۵	1.	2.	3.			4.				
1		***								
		or Operator: Certification of receipt of hazardous mater	ials covered by the manifest exc	ept as noted in Item	18a					
	Printed/Typed Name		Signature	7				Mon	th Day	Year
1								1	1	1
_										

Giant Resource Recovery-Sumter, Inc.

755 Industrial Rd - PO Box 1755 - Sumter, SC 29151 - Phone: (803) 773-1400 - Fax: (803) 773-7423

CERTIFICATE OF COMPLIANCE AND DISPOSAL

Generator:

DIAL CORPORATION - HAZLETON

125 JAYCEE DRIVE HAZLETON PA 18202

EPA ID Number:

PAD987271012

Manifest No:

013398858JJK

Date Received:

9/24/2014

Receiving Facility:

Giant Resource Recovery-Sumter, Inc.

EPA ID No:

SCD036275626

Facility Address:

755 Industrial Blvd.

Sumter SC 29151

On the referenced date, your waste material was received at our facility for the purpose of treating for disposal and/or recycling for reuse.

It will be processed in accordance with state and federal regulations. Any portion not recycled for reuse will ultimately be sent by Giant Resource Recovery to a permitted disposal facility.

Document: 428373

Date Shipped: 9/18/2014

		4.		1600	Tibua									
Ples	se nri	nt or type. (Form design	ned for use on	alite (12-nitch) ty	(newriter)						Eorm	Approved	OMP No.	2050 003
1		ORM HAZARDOUS	1. Generator ID I	Number	pewriter.)	2. Page 1 of	3. Eme	ergency Response	e Phone	4. Manifest	Tracking No	Approved. umber		2050-003
		ASTE MANIFEST	PA	987 27	1012	1	30	0-851-7	156	01	339	885	8 1	JK
		nerator's Name and Mailin	g Address	DIAL CORP 125 JAYCE WEST HAZ	ORATION E DRIVE LETON, PA 18	3505				nan mailing addres	ss)			
П		rator's Phone: nsporter 1 Company Name	e	70-455-99	80					U.S. EPA ID I	Number			
1			9	ELK TRANS	SPORTATION.	INC.				(3)	AD 98	7 271	020	
	7. Trai	nsporter 2 Company Name			e e					U.S. EPA ID N		file 2 1	Usa U	
		signated Facility Name and , , y's Phone:				WERY - E	SUMT	ER, INC.		U.S. EPA ID N		6 275	626	31
	9a. HM	9b. U.S. DOT Description and Packing Group (if a	on (including Prop		Hazard Class, ID Number	er,		10. Contai No.	ners Type	11. Total Quantity	12. Unit Wt./Vol.	13.	Waste Code	s
GENERATOR -	Х				nable Liquids nanoi), 3, PC			xxl	12	XIIO	6	0001	F003	
- GENE	AR.				able-Selids	Osganie	1 1	8 .	學	Till State of the				
		3.										. ,		
		4.				-				i.e				
	14 00	pecial Handling Instructions	A ddW I I			6 8 8 7 6 8 1			3 .					
	15. C	SENERATOR'S/OFFEROM marked and labeled/placare exporter, I certify that the co- certify that the waste mining	R'S CERTIFICAT ded, and are in al ontents of this co	ION: I hereby decl	lare that the contents of trondition for transport and to the terms of the attack	this consignment according to applicated EPA Acknow	are fully a	ernational and nati t of Consent.	scribed above	nental regulations.	D40	Elk Env 1915A4 , and are clas ipment and I	12024	6 .
1	Gener	ator's/Offeror's Printed/Typ	oed Name			Sig	nature	Constitution of the Consti	and designed to	1		Mor	nth Day	Year
+	46	10m/ =	swetz	***	Y 14		1587-151.20	and the same	2me of	ar and a second			1 /8	114
INT.L		ernational Shipments		to U.S.	[Export from I	U.S.	Port of en	try/exit:				- 1	
	_	porter signature (for export ansporter Acknowledgment		orials				Date leavi	ing U.S.:					
ZE		orter 1 Printed/Typed Nam		enais		Sig	nature					Mon	th Day	Year
PO	K	nan Ka	uenzo	ha		1 "	and the same					10	9114	114
TRANSPORTER	Transp	porter 2 Printed/Typed Nan				Sig	nature	Charles and the same of the sa	The same of the sa	- Committee of the comm		Mor	nth Day	Year
1	18. Dis	screpancy	7											-
	18a. D	iscrepancy Indication Space	ce Qu	antity	Туре	CSe		Residue	3.	Partial Rej	ection	[Full Reje	ction
-	18h A	Iternate Facility (or Genera	ator)				M	anifest Reference	Number:	U.O. EDIJIDA				
DESIGNATED FACILITY		s Phone:	alory				1		U -	U.S. EPAID N	lumber			
SNATED		ignature of Alternate Facili					-	ar-				Mo	onth Day	Year
SSIC	19. Ha	zardous Waste Report Ma	nagement Metho		es for hazardous waste tr		l, and rec	cycling systems)						
 -	1.	HUL	<u>c\</u>	2.		3.				4.				i i
		signated Facility Owner or	Operator: Certific	cation of receipt of	nazardous materials cov		fest exce	pt as noted in Iten	n 18a			Mo	nth Dav	Year
		1.44	- 1	War is		Jig I		A The	1.1-			I	nth Day	1 1

	×	2 DR	D001, F003	340.91	750		2/1/2013	011074086
83		SC SE	273.07	3276.80	3245	495	**	
			monthly avg (kg)	€	lbs	ິ ຜ	Total	2012
	×	1 DR	D001, F003	136.36	300	1	11/28/2012	009544782
	×	1 DR	D001, F003	204.55	450	1	11/1/2012	009544658
	×	1 DR	D001, D035, F003, F005	113.64	250	1	11/1/2012	009544659
	×	2 DR	D001, F003	409.09	900	1	8/10/2012	009543193
	×	3 DF	D002	546.00	I	150	8/10/2012	009543200
	×	2 DF	D002	145.60	I	40	8/10/2012	009543200
	×	2 DF	D002	109.20	I	30	5/7/2012	009543755
	×	2 DF	D001, D002, U122	22.73	50	I	5/7/2012	009543755
	×	2 DR	D001, F003	306.82	675	I	5/7/2012	009543756
	×	1 DF	D002	13.64	30	I	3/14/2012	009543557
	×	2 DF	D001	54.55	120	1	3/14/2012	009543557
	×	1 DR	D001, F003	200.20	I	55	3/13/2012	005015352
	×	1 DF	NONE	181.82	400	I	1/9/2012	008925266
	×	1 DF	D009, U151	4.55	10	l	1/9/2012	008925266
	×	1 DF	D002	4.55	10	l	1/9/2012	008925266
	×	2 DF	D008	22.73	50	I	1/9/2012	008925266
	×	2 DR	D001	400.40	1	110	1/9/2012	008925264
	×	2 DR	D001, F003	400.40	l	110	1/9/2012	008925264
Generator Status	Signed?	# of containers	Waste Code(s)	Amount (kg)	Amount (lbs)	Amount (G)	Date	Manifest #

012187414 JJK 012187341 JJK	012187413 JJK	012187425 JJK	011694241 JJK	012187435 JJK	012187402 JJK	012187426 JJK	012187401 JJK	Manifest #		2013	011696244 JJK	011073386	011073035	010407232	011073574	011073505	011073505	011074480	011074395	011074116
2/11/2014 2/11/2014	1/10/2014	1/10/2014	1/10/2014	1/7/2014	1/7/2014	1/6/2014	1/6/2014	Date		Total	12/31/2013	10/16/2013	8/5/2013	6/21/2013	5/13/2013	5/13/2013	5/13/2013	4/25/2013	4/25/2013	2/1/2013
2850	4675	4675	1750	-	30	4675	I	Amount (G)	12326	6	3000	I	1	2131	30	165	2500	I	4500	I
450	1	1	ŀ	14,850	1	- 1	1000	Amount (lbs)	3000	lbs	, I	450	800	I	I	I	I	900	1	100
10374.00 204.55	17017.00	17017.00	6370.00	6750.00	109.20	17017.00	454.55	Amount (kg)	46230.28	kg	10920.00	204.55	363.64	7756.84	109.2	600.60	9100.00	409.09	16380.00	45.45
D002 D001, F003	D002	D002	D002	D002	D002	D002	D001, F003	Waste Code(s)	3852.52	kg monthly avg (kg)	D002	D001, F003	D001, F003	D002	D001	D002	D002	D001, F003	D002	D001
6 TOTES 1 DR	17 TOTES	17 TOTES	1П	6 ТОТЕЅ	1 DR	17 TOTES	2 DR	# of containers Signed?			1П	1 DR	2 DR	1П	1 DR	3 DF	11 TOTES	2 DR	18 TOTES	2 DF
× ×	×	×	×	×	×	×	×	Signed?			×	×	×	×	×	×	×	×	×	×
LQG						LQG			•		LQG			LQG			LQG		LQG	

								×				3	90 days Jalays	37				4	1) Ody	S COMPANY OF THE PROPERTY OF T	
	106		106			LQG							b			106	LQG	1	200		
×	×	×	×	×	×	×	×	×	×	×	×	×	×××	×	×	×	×	×	×	×	
1 DR	11	1 DR	15 TOTES	1 DR	20 TOTES	1П	1П	1П	1 DR	2 DR	3 TOTES	1 DR	B ODR 9 TOTE	11	11	11	14 TOTES	1П	2 DR	1 DR	
D001	D002	D001, F003	D002	D001, F003	D002	D002	DCS F03	D002	D002	D002	D002	D002	., D022, F003	D001							
109.20	3822.00	200.20	18409.09	56.82	18200.00	8372.00	8736.00	6552.00	109.20	409.09	2730.00	200.20	45455 400 40 8190.00	5863.64	3527.27	6370.00	12376.00	2527.27	454.55 D001, D022, F003	163.80	
I	I	I	40,500	125	1	:	:	:	I	006	1	I	1000	12,900	09//	I	1	2560	1000	I	
30	1050	55	I	I	2000	2300	2400	1800	30	I	750	55	110	l	1	1750	3400	1	ı	45	
3/17/2014	3/25/2014	4/7/2014	4/7/2014	4/7/2014	4/15/2014	6/2/2014	6/3/2014	6/4/2014	6/17/2014	6/17/2014	6/17/2014	6/17/2014	9/18/2014 9/29/2014	9/29/2014	9/30/2014	11/5/2014	12/11/2014	12/23/2014	12/23/2014	12/23/2014	
012186852 JJK	012770555 JJK	012186910 JJK	012186906 JJK	012186906 JJK	006923669 FLE	013255066 JJK	013255220 JJK	013255221 JJK	012187843 JJK	012187833 JJK	012187844 JJK	012187844 JJK	013398841 JJK 9/18/2014 0133 98658 ON 9/16/14 007685201 FLE 9/29/2014	007685200 FLE	007685256 FLE	007684141 FLE	007685041 FLE	007684849 FLE	007685113 FLE	007685113 FLE	

lbs kg monthly avg (kg)

g

	×	2 DR	363.64 D001, D002, D022, F003	363.64	800	1	2/23/2016	009463724 FLE
			6677.33	80127.95	112,738	7935		
			kg monthly avg (kg)	kg	lbs	G	Total	2015
	×	1 DR	D001	17.27	38	ı	11/13/2015	008955819 FLE
	×	2 DR	D001, D022, F003	409.09	900	1	11/13/2015	008955819 FLE
	×	1 DR	D001, F003, F005	31.82	70	l	9/4/2015	008947676 FLE
LQG	×	4 TOTES	D002	3785.60	Ī	1040	9/4/2015	008947675 FLE
	×	17 TOTES	D002	16088.80		4420	8/26/2015	008947562 FLE
LQG	×	9 TOTES	D002	10681.82	23,500	1	8/13/2015	008949060 FLE
	×	1 DR	D001, D002, D022, F003	27.27	60	-	8/13/2015	008949059 FLE
	×	2 DR	D001	409.09	900	1	8/13/2015	008949059 FLE
	×	1П	D002	6463.64	14,220	1	6/29/2015	007675178 FLE
	×	7 TOTES	D002	7159.09	15,750		6/1/2015	008210119 FLE
	×	1 DR	D001	204.55	450		6/1/2015	008210120 FLE
	×	1 DR	45.45 D001, D002, D022, F003	45.45	100	-	6/1/2015	008210120 FLE
	×	2 DR	409.09 D001, D002, D022, F003	409.09	900		6/1/2015	008210120 FLE
LQG	×	ı	D002	20090.91	44,200	1	6/1/2015	008210118 FLE
LQG	×	1П	D002	5000.00	11,000	1	5/15/2015	008205536 FLE
	×	2 DR	295.45 D001, D002, D022, F003	295.45	650	1	2/19/2015	007685819 FLE
LQG	×	9 TOTES	D002	9009.00	-	2475	2/19/2015	007685818 FLE
	Signed?	# of containers Signed?	Waste Code(s)	Amount (kg)	Amount (lbs)	Amount (G)	Date	Manifest #
			15262.18	183146.16	86,045	39570	Total	2014

2016 Total	009416670 FLE 5/5/2016	009463724 FLE 2/23/2016	009403/24 FEE 2/23/2010
ရ	1	l	
lbs 2180	1000	300	9
kg n 990.91	454.55	136.36	30.30
monthly avg (kg) 220.20	D001, D022, F003	D002	7007
	2 DR	2 DR	1 07
	NO	×	;

SENT VIA CERTIFIED MAIL Tracking Document # 7004251000572608049

July 11, 2017

Regional Administrator EPA - Region 3 1650 Arch Street Philadelphia, PA 19103-2029

RE:

Biennial Reporting The Dial Corporation EPA ID: PAD987271012

Dear Sir,

The Dial Corporation completed an audit which discovered that the Biennial Reports for 2014 and 2016 should have been completed. Enclosed you will find these Biennial Reports for your review.

If you have any questions, please feel free to contact the SHE Manager, Janine Surmick, at Janine.surmick@henkel.com.

Sincerely,

James Babula,

Acting Plant Manager

FORM The A	PLETED I TO: ppropriate or Regional	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM	Approximately 1
M. BOX	eason for ubmittal ARK ALL ((ES) THAT APPLY	Reason for Submittal: ☐ To provide an Initial Notification (first time submitting site identification information / to obfor this location) ☐ To provide a Subsequent Notification (to update site identification information for this location) ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amen As a component of the Hazardous Waste Report (If marked, see sub-bullet below) ☐ Site was a TSD facility and/or generator of >1,000 kg of hazardous waste, >1 kg of a >100 kg of acute hazardous waste spill cleanup in one or more months of the report LQG regulations)	action) adment #) acute hazardous waste, or
	e EPA ID imber	EPA ID Number P A D 9 8 7 2 7 1 0 1 2	
3. Sit	e Name	Name: The Dial Corporation, A Henkel Company	
	e Location	Street Address: 125 Jaycee Drive	
Infe	ormation	City, Town, or Village: West Hazelton	County: Luzeme
		State: Pennysivania Country: United States	Zip Code: 18202
5. Site	e Land Type	Private County District Federal Tribal Municipal C	State Other
for	ICS Code(s) the Site		
	least 5-digit des)	В	
	e Mailing dress	Street or P.O. Box: 125 Jaycee Drive	The second secon
Aut	uress	City, Town, or Village: West Hazelton	
		State: Pennsylvania Country: United Statess	Zip Code: 18202
	Contact	First Name: Anthony MI: Last: Swetz	
reis	50II	Title: Environmental Coordinator	
		Street or P.O. Box: 125 Jaycee Drive	
		City, Town or Village: WEst Hazelton	
		State: PA Country: US	Zip Code: 18202
80	1	Email: tony.swetz@henkel.com	
	-	Phone: 570-455-9980 Ext.: 105	Fax: 570-455-5499 Date Became
	al Owner Operator	A. Name of Site's Legal Owner: Henkel Consumer Goods, Inc.	Owner:
of th	ne Site	Type: Private County District Federal Tribal Municipal	State Other
	1	Street or P.O. Box: 7201 East Henkel Way	
	r		Phone: 580-754-3425
	1	THE RESERVE OF THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED	Zip Code: 85255
			Date Became Operator:
		Operator Type: □ Private □ County □ District □ Federal □ Tribal □ Municipal	State Other

10. Type of Regulat Mark "Yes" or '	ted Waste Activity (at your site) "No" for all current activities (as of the date submitting	the form); complete any additional boxes as instructed.
A. Hazardous Was	te Activities; Complete all parts 1-10.	
	nerator of Hazardous Waste 'Yes," mark only one of the following – a, b, or c.	Y N ✓ 5. Transporter of Hazardous Waste if "Yes," mark all that apply.
₽ a.	LQG: Generates, in any calendar month, 1,000 kg/m (2,200 lbs/mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs/mo) of acute hazardous spill cleanup material.	b. Transfer Facility (at your site) Y N 6. Treater, Storer, or Disposer of Hazardous Waste Note: A hazardous waste Part R
□ b. 3	100 to 1,000 kg/mo (220 – 2,200 lbs/mo) of non-acute hazardous waste.	
c. (CESQG: Less than 100 kg/mo (220 lbs/mo) of non-acute hazardous waste.	If "Yes," mark all that apply.
Y N Z 2. Shor	t-Term Generator (generate from a short-term or one-time t and not from on-going processes). If "Yes," provide an ination in the Comments section.	a. Small Quantity On-site Burner Exemption b. Smelting, Melting, and Refining Furnace Exemption
Y N v 3. Unit	ed States Importer of Hazardous Waste	Y N . Underground Injection Control
Y N 🗸 4. Mixe	d Waste (hazardous and radioactive) Generator	Y N 10. Receives Hazardous Waste from Off-site
B. Universal Waste	Activities; Complete all parts 1-2.	C. Used Oil Activities; Complete all parts 1-4.
	Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate rypes of universal waste managed at your site. If "Yes nark all that apply.	Y N I 1. Used Oll Transporter If "Yes," mark all that apply. a. Transporter b. Transfer Facility (at your site)
ē	a. Batteries	Y N 2. Used Oil Processor and/or Re-refiner If "Yes," mark all that apply.
	Pesticides Mercury containing equipment	a. Processor b. Re-refiner
	A. Lamps Other (specify)	Y N 3. Off-Specification Used Oil Burner
	Other (specify)	Y N 4. Used Oil Fuel Marketer If "Yes," mark all that apply.
N	Pestination Facility for Universal Waste lote: A hazardous waste permit may be required for this ctivity.	a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Eligible Aca	demic Entities with	Laboratories—Not	ification for opting	into or withdrawing f	rom managing lab	oratory hazardous
♦ You ca	an ONLY Opt Into Su	bpart K if:	¥ #1			
agn	are at least one of the eement with a college ollege or university; A	e or university; or a n	ge or university; a tea non-profit research in	aching hospital that is distitute that is owned by	owned by or has a formal aff	ormal affiliation filiation agreement with
• you	have checked with y	our State to determi	ne if 40 CFR Part 26	2 Subpart K is effective	e in your state	
Y NV 1.0	Opting into or current	ly operating under 40	CFR Part 262 Subr	part K for the managen	nent of hazardous w	rastes in laboratories
	See the Item-by-item	n instructions for de	efinitions of types of	of eligible academic e	ntities. Mark all th	at apply:
	a. College or Unive					× 1
				tten affiliation agreen		
ب ا	c. Non-profit Institu	te that is owned by	or has a formal wr	itten affiliation agree	ment with a colleg	e or university
Y N 2. V	Vithdrawing from 40 (CER Part 262 Subna	rt K for the managen	nent of hazardous was	tes in laboratories	s
	of Hazardous Waste		Trick to managen	TIOTI OTTIAZATOOS WAS	les in adotatories	
			Index Disease Establish			
your site. Lis spaces are n	it them in the order th	ley are presented in	the regulations (e.g.,	e waste codes of the F D001, D003, F007, U	-ederal hazardous v 112). Use an additi	vastes handled at onal page if more
D001	D002	D022	D035	F003	F005	
	(8)					
Haller			<u> </u>	ļ		
					water the second	
	0	***				
		4	54			
W-			2			
			8)	 	•	
		-		<u> </u>		
 Waste Codes hazardous wa spaces are ne 	stes handled at your	i (i.e., non-Federal) site. List them in the	Hazardous Wastes order they are pres	 Please list the waste ented in the regulation 	codes of the State- s. Use an additions	Regulated Il page if more
						-
	er. g-					
					3	

12. Notification of Hazardous Secondary Ma	aterial (HSM) Activity		
Y N Are you notifying under 40 CFR secondary material under 40 CFR	260.42 that you will begin managing, are manag R 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (ing, or will stop managing h	azardous
If "Yes," you must fill out the Add Material.	endum to the Site Identification Form: Notification	n for Managing Hazardous	Secondary
13. Comments	ALL MANAGEMENT OF THE PARTY OF	0.8	
In 2014 and 2015 the facility experienced h	ydrolysis reaction events with the raw mate	rial, called AES,	17
(or High Active Sodium Laureth Sulfate) wi	hile in the raw material storage tank prior to	use in the production pro	cess.
The hydrolysis reaction acidified the AES to	a point where it was unusable in the produ	ction process. Disposing	of the off-
specification raw material from the 8,000 ga	alion storage tank generated up to 30,000 K	G of corrosive waste.	
	8		1.7
A.			
	27)		
- A # F/F/6	, v		THE STATE OF THE S
		4	
19	A Commence of the Commence of	***************************************	

A SALAMAN AND A	What have been a second and the seco	At the second distance and the second	
	·		
on my inquiry of the person or persons who information submitted is, to the best of my kind penalties for submitting false information, income penalties for submitting false information, income penalties for submitting false information.	that this document and all attachments were pre re that qualified personnel properly gather and e manage the system, or those persons directly re nowledge and belief, true, accurate, and comple cluding the possibility of fines and imprisonment , all owner(s) and operator(s) must sign (see 40	valuate the information sub- esponsible for gathering the te. I am aware that there ar for knowing violations. For	nitted. Based information, the e significant the RCRA
Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)	
JUSH	Junes V. Babula, Actmy Plant Manyo	07/11/2017	
	Plant Maryer	-	

BEFOR	E COPYING FORM, ATTACH SITE IDENTIFICATION LA	BEL				RONMENTAL
SITE NA	MF. The Dial Corporation				PROTECT	ION AGENCY
0.72,10			_	GM	2015 Hazardo	ous Waste Report
EPA ID	Number PAD98727110	1 2]	FORM		SENERATION NAGEMENT
Sec. 1	A. Waste description: Flammable spent lab solvents	¥1:				
B. EPA	hazardous waste code(s)	C.	State hazardou	is waste code((s)	
LD	0 0 1 0 0 0 2 0 2 2					
LE	003111111					
D. Sou	rce code E. Form code	F. (Quantity genera	ted in 2015		G. Waste
G	2 2 W 2 0 3] L		1 6 5	0.0	minimization code
Manage	ement Method code for Source code G25	l	JOM 1		er N	[X]
L		D	ensity		□ lbs/gal □ sg	
Sec. 2	Was any of this waste that was generated at this facility ☐ Yes (CONTINUE TO ON-SITE PROCESS S ☐ No (SKIP TO SEC. 3)					
	ON-SITE PROCESS SYSTEM 1			ON-SITE I	PROCESS SYSTE	M 2
	Management Quantity treated, disposed, or od code recycled on site in 2015		On-site Manag Method cod		Quantity treated, d recycled on site	
Н			[H]			
Sec. 3	A. Was any of this waste shipped off site in 2015 for trea ■ Yes (CONTINUE TO ITEM B) □ No (FORM IS COMPLETE)	tment,	disposal, or rec	cycling?		120
Site 1	B. EPA ID No. of facility to which waste was shipped		C. Off-site Mar	nagement	D. Total quantity s	hipped in 2015
v	P A D 0 8 5 6 9 0 5 9	2	Method code H 0			1 6 5 0 0
Site 2	B. EPA ID No. of facility to which waste was shipped	-	C. Off-site Mar		D. Total quantity s	hipped in 2015
		Ш	Method code	snipped to		
Site 3	B. EPA ID No. of facility to which waste was shipped		C. Off-site Mar		D. Total quantity s	hipped in 2015
		Ш	Method code	snipped to		
Commen No minim	ts: ization effort for this waste. Waste is created performing routine l	laborato	ory analysis on inc	coming raw mate	erials and finished pro	oducts.

1	E COPYING FORM, ATTACH SITE IDENT ER:	L			RONMENTAL	
SITE NA	MF. The Dial Corporation				PROTECT	ION AGENCY
017211			9	GM	2015 Hazardo	ous Waste Report
EPA ID	Number P A D 9 8 7 2	7 1 1 0 1 1	2	FORM	WASTE O	ENERATION
					AND MA	NAGEMENT
Sec. 1	A. Waste description: Raw Material that hyd	drolized after deliver	y and degraded into a	low pH materia	I.	
	hazardous waste code(s)		C. State hazardou	s waste code((s)	
LD	0 0 2					
L						
D. Sou	rce code	E. Form code	F. Quantity genera	ted in 2015		G. Waste minimization code
G	111	W 5 1 9	2	3 7 9 7	0.0	minimization code
Manage	ement Method code for Source code G25	2	UOM 1			A
L		= 1	Density	11 1 1	□ lbs/gal □ sg	
Sec. 2	Was any of this waste that was generate	ed at this facility tre	eated, disposed, an	d/or recycled o	on site?	
	☐ Yes (CONTINUE TO ON-SITE	E PROCESS SYS	TEM 1)			
	ON-SITE PROCESS SYSTEM	1	T	ON-SITE I	PROCESS SYSTE	M 2
	Management Quantity treated, od code recycled on sit		On-site Manag		Quantity treated, di recycled on site	
						in 2015
Н		1111] [н] [J LL		in 2015
Sec. 3	A. Was any of this waste shipped off site i Yes (CONTINUE TO ITEM B) No (FORM IS COMPLETE)	in 2015 for treatme		cycling?		In 2015
Sec. 3	Yes (CONTINUE TO ITEM B)	3	ent, disposal, or rec	nagement	D. Total quantity s	
Sec. 3	■ Yes (CONTINUE TO ITEM B) □ No (FORM IS COMPLETE)	was shipped	C. Off-site Mai	nagement shipped to		
Sec. 3	■ Yes (CONTINUE TO ITEM B) □ No (FORM IS COMPLETE) B. EPA ID No. of facility to which waste	was shipped	C. Off-site Man Method code C. Off-site Man Method code C. Off-site Man Method code	nagement shipped to 1 0		shipped in 2015
Sec. 3	■ Yes (CONTINUE TO ITEM B) □ No (FORM IS COMPLETE) B. EPA ID No. of facility to which waste □ P A D 0 1 0 1 5	was shipped	C. Off-site Man Method code	nagement shipped to 1 0	1 [shipped in 2015
Sec. 3	■ Yes (CONTINUE TO ITEM B) □ No (FORM IS COMPLETE) B. EPA ID No. of facility to which waste □ P A D 0 1 0 1 5	was shipped 4	C. Off-site Man Method code C. Off-site Man Method code C. Off-site Man Method code	nagement shipped to 1 0 nagement shipped to	D. Total quantity s	shipped in 2015 2 9 7 0 0 shipped in 2015
Sec. 3 Site 1	■ Yes (CONTINUE TO ITEM B) □ No (FORM IS COMPLETE) B. EPA ID No. of facility to which waste □ P A D 0 1 0 1 5 B. EPA ID No. of facility to which waste	was shipped 4	C. Off-site Man Method code C. Off-site Man Method code C. Off-site Man Method code	nagement shipped to 1 0 1 nagement shipped to 1 nagement	1 [shipped in 2015 2 9 7 0 0 shipped in 2015
Sec. 3 Site 1 Site 2 Site 3	Yes (CONTINUE TO ITEM B) No (FORM IS COMPLETE) B. EPA ID No. of facility to which waste of the property of t	was shipped 4	C. Off-site Man Method code C. Off-site Man Method code C. Off-site Man Method code C. Off-site Man Method code	nagement shipped to 1 0 1 nagement shipped to 1 nagement	D. Total quantity s	shipped in 2015 2 9 7 0 0 shipped in 2015

BEFORE OR ENT	The	FORM, AT		E IDENT	TIFICAT	TION LA	BEL				RONMENTAL TON AGENCY
142 m	ACCEPTED (ε			≘v 3		71		2015 Hazard	ous Waste Report
EPA ID I	Number [P A D	9 8	7 2	7 1	1][0]	1 2		GM FORM		SENERATION NAGEMENT
Sec. 1	A. Waste d	escription: F	lammable	spent lab	solvent	S					
B. EPA	hazardous v	vaste code	(s)				C.	State hazardo	us waste code	(s)	
D	001	DOO	2 D	0 2	2						
<u></u> F	003	LLL			`		le				
D. Sour	rce code			E	E. Forn	n code	F.	Quantity genera	ated in 2015		G. Waste
G	2 2				W 2	03	L		1 8 0	0.0	minimization code
Manage	ement Metho	d code for S	Source cod	le G25			ι	JOM 1		60	В
L	Ш		-			14		ensity		□ lbs/gal □ sg	
Sec. 2		f this waste Yes (CONT No (SKIP T	INUE TO	ON-SIT		•		ed, disposed, ar M 1)	nd/or recycled	on site?	
		N-SITE PR			1				ON-SITE	PROCESS SYSTE	M 2
		N-SITE PR	OCESS S	YSTEM	dispos			On-site Mana	gement	PROCESS SYSTE Quantity treated, d recycled on site	lisposed, or
	O	N-SITE PR	OCESS S	YSTEM treated,	dispos			A CONTRACTOR OF THE PROPERTY O	gement	Quantity treated, d	lisposed, or
Meth	Management od code A. Was any	N-SITE PR	Quantity recycled te shipped NUE TO I	treated, ed on sit	dispos e in 20	15	tment	Method co	gement de	Quantity treated, d	lisposed, or
Meth	Management od code A. Was any	of this wast	Quantity recycled leshipped NUE TO I'S	treated, ed on sit	dispos e in 20 	for treat	tment	Method co	gement de cycling?	Quantity treated, d	lisposed, or in 2015
Meth	A. Was any	of this wast 'es (CONTI	Quantity recycle e shipped NUE TO I's COMPL ty to which	treated, ed on sit off site TEM B) ETE) n waste	dispos e in 20 l l in 2015 was sh	for treat		Method co	gement de cycling?	Quantity treated, d recycled on site	lisposed, or in 2015
Meth H Sec. 3	A. Was any	of this wast 'es (CONTI lo (FORM I No. of facili	Quantity recycle shipped NUE TO I'S COMPL	treated, ed on sit off site TEM B) ETE) n waste 6 9	dispos e in 20 in 2015 was sh	for treat		Method co	gement de cycling? nagement e shipped to 6 1	Quantity treated, d recycled on site	shipped in 2015
Meth H Sec. 3	A. Was any B. EPA ID	of this wast 'es (CONTI lo (FORM I No. of facili	Quantity recycle shipped NUE TO I'S COMPL	treated, ed on sit off site TEM B) ETE) n waste 6 9	dispos e in 20 in 2015 was sh	for treat		Method co	gement de cycling? nagement e shipped to 6 1	Quantity treated, description recycled on site	shipped in 2015
Meth H Sec. 3 Site 1	A. Was any B. EPA ID P A B. EPA ID	of this wast 'es (CONTI lo (FORM I No. of facili	Quantity recycle shipped NUE TO I'S COMPL ty to which ty to which ty to which	treated, ed on sit off site TEM B) ETE) n waste 6 9	dispos e in 20 lin 2015 was sh l 0	for treat		Method co	gement de cycling? magement e shipped to 6 1 magement e shipped to	Quantity treated, description recycled on site	shipped in 2015 1 8 0 0 0 0
Meth H Sec. 3 Site 1	A. Was any B. EPA ID P A B. EPA ID	of this wast 'es (CONTI lo (FORM I No. of facili D 0 6	Quantity recycle shipped NUE TO I'S COMPL ty to which ty to which ty to which	treated, ed on sit off site TEM B) ETE) n waste 6 9	dispos e in 20 lin 2015 was sh l 0	for treat		Method co	gement de cycling? magement e shipped to 6 1 magement e shipped to	D. Total quantity	shipped in 2015 1 8 0 0 0 0

OR ENTER:	ING FORM, ATTACH SITE IDEN	ITIFICATION LABE	:L			ONMENTAL
SITE NAME:	The Dial Corporation				PROTECTIO	ON AGENCY
OTE NAME.		Į.		GM	2015 Hazardou	s Waste Report
EPA ID Numbe	r P A D 9 8 7 2	2 7 1 0 1	2	FORM		NERATION AGEMENT
Sec. 1 A. Wa	aste description: Obsolete oil based	paint.		ж.		
B. EPA hazard	dous waste code(s)		C. State hazardou	s waste code((s)	
D 0 0	0 1 F 0 0 3 F 0 0	0 5				
D. Source cod	е	E. Form code	F. Quantity genera	ted in 2015	G.	Waste
[G] 1 1	J	[W 6 0 3]		7	0 .[0]	minimization code
Management N	Method code for Source code G25	a .	UOM 1			[X]
	LJ	01	Density		□ lbs/gal □ sg	W S
Sec. 2 Was	any of this waste that was generat Yes (CONTINUE TO ON-SI No (SKIP TO SEC. 3)	TE PROCESS SYS	0 4 1 4 1	d/or recycled o	on site?	
	ON OUTE DESCRIPTION					
	ON-SITE PROCESS SYSTEM	И 1		ON-SITE	PROCESS SYSTEM	2
On-site Manage Method code	ement Quantity treated	d, disposed, or	On-site Manag Method coo	jement	Quantity treated, disp recycled on site in	oosed, or
	ement Quantity treated	d, disposed, or		jement	Quantity treated, disp	oosed, or
Method cod	ement Quantity treated	t, disposed, or ite in 2015	Method coo	gement de	Quantity treated, disp	oosed, or
Method cod	ement Quantity treated recycled on s	t, disposed, or ite in 2015	Method cod H	gement de	Quantity treated, disp	oosed, or 2015
Method cod	ement Quantity treated recycled on so any of this waste shipped off site Yes (CONTINUE TO ITEM B) No (FORM IS COMPLETE) PA ID No. of facility to which waste	d, disposed, or lite in 2015	Method code H H H H H H H H H H	gement de	Quantity treated, disp recycled on site in	oosed, or 2015
Method cod	ement Quantity treated recycled on so any of this waste shipped off site Yes (CONTINUE TO ITEM B) No (FORM IS COMPLETE) PA ID No. of facility to which waste	t, disposed, or ite in 2015 ite in 2015 in 2015 for treatment was shipped 0 5 9 2	Method code H ent, disposal, or recommendation of the code H 0 C. Off-site Mar	gement de	Quantity treated, disp recycled on site in	posed, or 2015
Method cod	ement Quantity treated recycled on so recycled on s	t, disposed, or ite in 2015 ite in 2015 in 2015 for treatment was shipped 0 5 9 2	Method code H ent, disposal, or recommendation of the code H 0	gement de	Quantity treated, disprecycled on site in	posed, or 2015
Method codd H	ement Quantity treated recycled on so recycled on s	d, disposed, or ite in 2015 in 2015 for treatment was shipped 0 5 9 2 was shipped	Method cod H H H H H H H H H H	gement de la	Quantity treated, disprecycled on site in	pped in 2015
Method codd H Sec. 3 A. Was Site 1 B. EF	ement Quantity treated recycled on so sany of this waste shipped off site Yes (CONTINUE TO ITEM B) No (FORM IS COMPLETE) PA ID No. of facility to which waste A D 0 8 5 6 9 PA ID No. of facility to which waste A D 0 8 5 6 9	d, disposed, or ite in 2015 ite in 2015 in 2015 for treatment was shipped 0 5 9 2 was shipped	Method cod H H H H H H H H H H	gement de la	Quantity treated, disp recycled on site in D. Total quantity ship D. Total quantity ship	pped in 2015

			*	1	*5	
BEFORI OR ENT	E COPYING FORM, ATTACH SITE IDEN ER:	EL			RONMENTAL	
SITE NA	The Dial Corporation				PROTECT	ION AGENCY
SILIVA	IVIC.			GM	2015 Hazardo	ous Waste Repor
EPA ID	Number P A D 9 8 7 2	2 7 1 0 1	121	FORM	WASTE O	SENERATION
		-1.1.1191.	1-1			NAGEMENT
Sec. 1	A. Waste description: Aerosol Waste					
B. EPA	hazardous waste code(s)		C. State hazardou	is waste code	(e)	
	0 0 1 D 0 3 5 L					
1		1.1				1 1 1 1 1
D. Sour	ce code	E. Form code	F. Quantity genera	ated in 2015		G. Waste
G	1 1	[W 2 0 3]			0.0	minimization code
Manage	ment Method code for Source code G25	;	UOM 1			[B]
				11 1 1		
			Density		□ lbs/gal □ sg	
Sec. 2	Was any of this waste that was genera ☐ Yes (CONTINUE TO ON-SI ☐ No (SKIP TO SEC. 3)			d/or recycled	on site?	
	ON-SITE PROCESS SYSTEM	W 1		ON-SITE	PROCESS SYSTE	M 2
	Management Quantity treated od code recycled on s		On-site Manag Method cod		Quantity treated, di recycled on site	
H			_ H L			
Sec. 3	A. Was any of this waste shipped off site ☑ Yes (CONTINUE TO ITEM B ☐ No (FORM IS COMPLETE)	e in 2015 for treatm)	ent, disposal, or red	cycling?		
Site 1	B. EPA ID No. of facility to which waste	e was shipped	C. Off-site Mar	nagement	D. Total quantity s	hipped in 2015
	P A D 0 8 5 6 9	0 5 9	Method code 2 H 0			4 0 0
Site 2	B. EPA ID No. of facility to which waste	was shipped	C. Off-site Mar		D. Total quantity s	hipped in 2015
			Method code	shipped to		
Site 3	B. EPA ID No. of facility to which waste	was shipped	C. Off-site Mar	nagement	D. Total quantity s	hipped in 2015
			Method code	shipped to		
Commen	is:					
Waste is t	elended into alternative fuels off-site.					

OR ENT	E COPYING FORM, ATTACH SITE IDI	EL			RONMENTAL ION AGENCY	
SITE NA	AME: The Dial Corporation				PROTECT	ION AGENCY
		o s		GM	2015 Hazardo	ous Waste Report
EPA ID	Number PAD987	2 7 1 0 1	2	FORM		ENERATION NAGEMENT
Sec. 1	A. Waste description: Lab pack sample	s of Flammable Esterqu	uat Quarternary Ammo	nium Compoun	d containing up to 159	% Ethanol
	hazardous waste code(s)		C. State hazardou	is waste code	(s)	
LD	0 0 1					
L		<u>L</u> LL				
D. Sou	rce code	E. Form code	F. Quantity genera	ted in 2015		G. Waste
G	1 9	W 0 0 1		3	8]. 0	minimization code
Manage	ement Method code for Source code G	25	UOM 1			X
1		00	Density	11 1 1	Diba/aal Daa	
			Density		□ lbs/gal □ sg	
Sec. 2	Was any of this waste that was gene Yes (CONTINUE TO ON- No (SKIP TO SEC. 3)	SITE PROCESS SYS		d/or recycled	on site?	
	ON-SITE PROCESS SYST	EM 4		ON-SITE	PROCESS SYSTE	M 2
	ON-OTHER ROOLEGE CTOT	CIVI I	-			
	Management Quantity treat	ted, disposed, or n site in 2015	On-site Manag Method cod	gement	Quantity treated, di recycled on site	sposed, or
	Management Quantity treat	ted, disposed, or		gement	Quantity treated, di	sposed, or
Meth	Management Quantity treat	ted, disposed, or n site in 2015	Method coo	gement de	Quantity treated, di	sposed, or
Meth	Management Quantity treat red code recycled or A. Was any of this waste shipped off s	ted, disposed, or n site in 2015	Method code	gement de	Quantity treated, di	sposed, or n 2015
Meth	Management Quantity treat recycled or A. Was any of this waste shipped off s Yes (CONTINUE TO ITEM No (FORM IS COMPLETE) B. EPA ID No. of facility to which was	ted, disposed, or n site in 2015	Method code H	gement de cycling? nagement shipped to	Quantity treated, di recycled on site	sposed, or n 2015
Meth	Management Quantity treat recycled or A. Was any of this waste shipped off s Yes (CONTINUE TO ITEM No (FORM IS COMPLETE) B. EPA ID No. of facility to which was	ted, disposed, or in site in 2015	Method code H	gement de L.	Quantity treated, di recycled on site	sposed, or n 2015
Meth	Management Quantity treat recycled or A. Was any of this waste shipped off s Yes (CONTINUE TO ITEM No (FORM IS COMPLETE) B. EPA ID No. of facility to which was	ted, disposed, or in site in 2015	Method code H	gement de L.	Quantity treated, di recycled on site	sposed, or n 2015
Meth H Sec. 3 Site 1	Management Quantity treat recycled or A. Was any of this waste shipped off s Yes (CONTINUE TO ITEM No (FORM IS COMPLETE) B. EPA ID No. of facility to which was	ted, disposed, or in site in 2015	Method code H	gement de Cycling? magement shipped to 6 1 magement shipped to magement shipped to magement	Quantity treated, di recycled on site	sposed, or in 2015 hipped in 2015 3 8 0 hipped in 2015
Meth H Sec. 3 Site 1	Management Quantity treat recycled or lead code recycled or lead c	ted, disposed, or in site in 2015	Method code H	gement de Cycling? magement shipped to 6 1 magement shipped to magement shipped to magement	Quantity treated, di recycled on site	sposed, or in 2015 hipped in 2015 3 8 0 hipped in 2015

BEFOR OR ENT	E COPYING FORM, ATTACH SITE IDENTIFICATION LABEL ER:				RONMENTAL TION AGENCY
SITE NA	The Dial Corporation		*	PROTECT	ION AGENCY
OTTE IV	3	2015 Hazard	ous Waste Report		
EPA ID	Number P A D 9 8 7 2 7 1 0 1 2		GM FORM	WASTE	SENERATION
				NAGEMENT	
	T				
Sec. 1	A. Waste description: Flammable Esterquat Quarternary Ammoniu	m Compound cont	aining up to 15	% Ethanol and spill m	naterials.
B. EPA	hazardous waste code(s) C.	State hazardou	s waste code	(s)	
	0 0 1				
D. Sou	rce code E. Form code F.	Quantity genera	ted in 2015		G. Waste
G	3 2 W 0 0 2	\perp	5 1	0 . 0	minimization code
Manage	ement Method code for Source code G25	UOM 1			[X]
1			11 1 1		
		Density		□ lbs/gal □ sg	
Sec. 2	Was any of this waste that was generated at this facility treated. ☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTE ☐ No (SKIP TO SEC. 3)	architecture of the court of the lead of	d/or recycled	on site?	
	ON-SITE PROCESS SYSTEM 1		ON-SITE	PROCESS SYSTE	M 2
	Management Quantity treated, disposed, or recycled on site in 2015	On-site Manag Method cod		Quantity treated, or recycled on site	
<u> </u> H		[H]			
Sec. 3	A. Was any of this waste shipped off site in 2015 for treatment Types (CONTINUE TO ITEM B)	, disposal, or rec	cycling?		
	□ No (FORM IS COMPLETE)				
Site 1	B. EPA ID No. of facility to which waste was shipped	C. Off-site Mar		D. Total quantity	shipped in 2015
	P A D 0 8 5 6 9 0 5 9 2	Method code			5 1 0 0
Site 2	B. EPA ID No. of facility to which waste was shipped	C. Off-site Mar		D. Total quantity	shipped in 2015
		Method code	shipped to		
Site 3	B. EPA ID No. of facility to which waste was shipped	C. Off-site Mar		D. Total quantity	shipped in 2015
		Method code	shipped to		
Commer	nts:	1		<u> </u>	
Waste ge	enerated during maintenance. Waste is blended into alternative fuels of	f-site.			
					1

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER: The Dial Corporation				* 5	U.S. ENVIRONMENT PROTECTION AGE		
SITE NA	ME:			GM	2013 2015 Hazardous Wast	e Report	
EPA ID	Number	2 7 1 0 1	2	FORM	WASTE GENERAT		
Sec. 1	A. Waste description: Raw Material that	hydrolized after deliver	y and degraded into a	low pH materia	al.		
B. EPA	hazardous waste code(s)		C. State hazardou	is waste code	(s)	Marking Towns	
D 0 0 2							
L							
D. Source code E. Form code			G. Waste				
[G 1 1 1 W 5 1 9			minimization code				
Management Method code for Source code G25		UOM 1	UOM 1				
		Density	Density				
Sec. 2 Was any of this waste that was generated at this facility treated, disposed, and/or recycled on site? ☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) ☐ No (SKIP TO SEC. 3)							
ON-SITE PROCESS SYSTEM 1				ON-SITE PROCESS SYSTEM 2			
	ON-SITE PROCESS SYSTE	M 1		011 0112			
	4	d, disposed, or	On-site Manag Method coo	gement	Quantity treated, disposed, or recycled on site in 2015.	n i	
	Management Quantity treate	d, disposed, or		gement	Quantity treated, disposed, or		
Meth	Management Quantity treate	d, disposed, or site in 2015	Method coo	gement de	Quantity treated, disposed, or recycled on site in 2015		
Meth	Management Quantity treate od code recycled on some services. A. Was any of this waste shipped off sit of Yes (CONTINUE TO ITEM E	d, disposed, or site in 2015	Method coo	gement de gement gement gement	Quantity treated, disposed, or recycled on site in 2015		
Meth	Management Quantity treate od code recycled on some code recycled on some code. A. Was any of this waste shipped off sit Yes (CONTINUE TO ITEM E No (FORM IS COMPLETE)	d, disposed, or site in 2015	Method code H H H H H H H H H H	gement de	Quantity treated, disposed, or recycled on site in 2015	015	
Meth	Management Quantity treate od code recycled on some code recycled on some code. A. Was any of this waste shipped off sit A. Was any of this waste shipped off sit A. Was any of this waste shipped off sit A. Was any of this waste shipped off sit B. Yes (CONTINUE TO ITEM E D. No (FORM IS COMPLETE) B. EPA ID No. of facility to which waste	d, disposed, or site in 2015	Method code H	gement de	Quantity treated, disposed, or recycled on site in 2015	015 5 0 0	
Meth	Management Quantity treate od code recycled on some of this waste shipped off sit A. Was any of this waste shipped off sit Yes (CONTINUE TO ITEM E No (FORM IS COMPLETE) B. EPA ID No. of facility to which waste	d, disposed, or site in 2015	Method code H	gement de Cycling? nagement shipped to 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	Quantity treated, disposed, or recycled on site in 2015	015 5 0 0 0 15 2013	
Meth	Management Quantity treate od code recycled on some of this waste shipped off sit and Yes (CONTINUE TO ITEM E No (FORM IS COMPLETE) B. EPA ID No. of facility to which waste the properties of	d, disposed, or site in 2015	Method code H	gement de	Quantity treated, disposed, or recycled on site in 2015 D. Total quantity shipped in 2 D. Total quantity shipped in 2	015 5 0 0 0 045 20 3 1 0 0 0	
Meth H Sec. 3	Management Quantity treate od code recycled on some of this waste shipped off sit A. Was any of this waste shipped off sit Per (CONTINUE TO ITEM E No (FORM IS COMPLETE) B. EPA ID No. of facility to which waste M I D 9 8 0 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9	d, disposed, or site in 2015	Method code H	gement de	Quantity treated, disposed, or recycled on site in 2015 D. Total quantity shipped in 2 D. Total quantity shipped in 2	015 5 0 0 0 045 20 3 1 0 0 0	
Meth H Sec. 3 Site 1 Site 2 Site 3	Management Quantity treate od code recycled on a recycled	d, disposed, or site in 2015	Method code H	gement de	Quantity treated, disposed, or recycled on site in 2015 D. Total quantity shipped in 2 D. Total quantity shipped in 2	015 5 0 0 0 045 20 3 1 0 0 0	
Meth H Sec. 3 Site 1 Site 2 Site 3	Management Quantity treate od code recycled on so code recycled on	d, disposed, or site in 2015	Method code H	gement de	Quantity treated, disposed, or recycled on site in 2015 D. Total quantity shipped in 2 D. Total quantity shipped in 2	015 5 0 0 0 045 20 3 1 0 0 0	

OR ENT	BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER: SITE NAME: The Dial Corporation 2015 Hazardous Waste I										
EPA ID I	 Number	P A D 9 8 7	2 7 1 0 1	2	GM FORM	WASTE	ous Waste Report BENERATION NAGEMENT				
Sec. 1	A. Wast	te description: Flammable spent	lab solvents	6	0						
В. ЕРА	hazardo	us waste code(s)		C. State hazardou	is waste code	e(s)					
D	000	1 F 0 0 3									
L											
D. Sour	rce code		E. Form code	F. Quantity genera	ited in 2 015	2013	G. Waste				
G	2 2		W 2 0 3		2 9 0	0.0	minimization code				
Manage	ement Me	thod code for Source code G2	5	UOM 1			X				
L		_	,	Density	_ 	☐ lbs/gal ☐ sg	ē				
Sec. 2		y of this waste that was generally Yes (CONTINUE TO ON-S No (SKIP TO SEC. 3)	ITE PROCESS SY				,				
		ON-SITE PROCESS SYSTE	M 1		ON-SITE	PROCESS SYSTE	M 2				
	Managen od code	nent Quantity treate recycled on	ed, disposed, or site in 2015	On-site Manag Method cod		Quantity treated, or recycled on site					
Н				<u> </u>	<u> </u>						
Sec. 3		any of this waste shipped off si Yes (CONTINUE TO ITEM I No (FORM IS COMPLETE)		nent, disposal, or red	cycling?		2013				
Site 1	B. EPA	ID No. of facility to which was	te was shipped	C. Off-site Ma		D. Total quantity					
	Ls c	D 0 3 6 2 7	7 5 6 2	Method code H 0	shipped to		2 9 0 0 0				
Site 2	B. EPA	ID No. of facility to which was	te was shipped	C. Off-site Ma		D. Total quantity	shipped in 2015				
	LL			Method code	shipped to						
Site 3	В. ЕРА	ID No. of facility to which was	te was shipped	C. Off-site Ma		D. Total quantity	shipped in 2015				
	L_L			Method code	snipped to						
Commen No minim		ort for this waste. Waste is created	performing routine lat	poratory analysis on in	coming raw ma	terials and finished pr	oducts.				

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:	U.S. ENVIRONMENTAL											
ISITE NAME:	PROTECTION AGENCY											
SITE NAME.	کوئ 2 015 Hazardous Waste Report											
	GM											
EPA ID Number P A D 9 8 7 2 7 1 0 1 2	FORM WASTE GENERATION											
	AND MANAGEMENT											
Sec. 1 A. Waste description: Obsolete oil based paint.												
	dous waste code(s)											
D 0 0 1 F 0 0 3 F 0 0 5												
D. Source code E. Form code F. Quantity gene	erated in 2 015 2013 G. Waste minimization code											
[G] 1] 1 [W] 2 0 3 [2 7 0 0 0											
Management Method code for Source code G25 UOM 1	[X]											
Density												
	L l l l l l l l l l l l l l l l l l l l											
Sec. 2 Was any of this waste that was generated at this facility treated, disposed, and/or recycled on site?												
Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)												
■ No (SKIP TO SEC. 3)												
ON-SITE PROCESS SYSTEM 1 ON-SITE PROCESS SYSTEM 2												
On-site Management Quantity treated, disposed, or Method code recycled on site in 2015 On-site Management Quantity treated, disposed, or Method code recycled on site in 2015												
On-site Management Quantity treated, disposed, or On-site Man	nagement Quantity treated, disposed, or											
On-site Management Quantity treated, disposed, or On-site Man	nagement Quantity treated, disposed, or											
On-site Management Quantity treated, disposed, or Method code recycled on site in 2015 On-site Management Method of	nagement Quantity treated, disposed, or recycled on site in 2015 recycling?											
On-site Management Quantity treated, disposed, or Method code recycled on site in 2015 On-site Mar Method of Method	nagement Quantity treated, disposed, or code recycled on site in 2015											
On-site Management Quantity treated, disposed, or Method code recycled on site in 2015 On-site Mar Method of Method	recycling? D. Total quantity shipped in 2015											
On-site Management Quantity treated, disposed, or Method code recycled on site in 2015 On-site Management Method of	Pagement Quantity treated, disposed, or recycled on site in 2015 Precycling? Anagement ode shipped to Quantity treated, disposed, or recycling 2015 Precycling? D. Total quantity shipped in 2015											
On-site Management Quantity treated, disposed, or Method code recycled on site in 2015 Sec. 3 A. Was any of this waste shipped off site in 2015 for treatment, disposal, or Yes (CONTINUE TO ITEM B) No (FORM IS COMPLETE) Site 1 B. EPA ID No. of facility to which waste was shipped Site 2 B. EPA ID No. of facility to which waste was shipped Site 2 B. EPA ID No. of facility to which waste was shipped C. Off-site No. Site 2 B. EPA ID No. of facility to which waste was shipped C. Off-site No. Site 2 B. EPA ID No. of facility to which waste was shipped C. Off-site No. Site 2 B. EPA ID No. of facility to which waste was shipped C. Off-site No. Site 2 B. EPA ID No. of facility to which waste was shipped	Adaptement Quantity treated, disposed, or recycled on site in 2015 recycling? Adaptement ode shipped to 0 6 1 D. Total quantity shipped in 2015 Management D. Total quantity shipped in 2015											
On-site Management	Procedure of the process of the proc											
On-site Management	Adaptement D. Total quantity shipped in 2015 Management ode shipped to D. Total quantity shipped in 2015 Management ode shipped to D. Total quantity shipped in 2015 Management ode shipped to D. Total quantity shipped in 2015 Management ode shipped to D. Total quantity shipped in 2015 Management D. Total quantity shipped in 2015											
On-site Management	Management ode shipped to Old Shippe											
On-site Management Quantity treated, disposed, or Method code recycled on site in 2015 Sec. 3 A. Was any of this waste shipped off site in 2015 for treatment, disposal, or Yes (CONTINUE TO ITEM B) No (FORM IS COMPLETE) Site 1 B. EPA ID No. of facility to which waste was shipped Site 2 B. EPA ID No. of facility to which waste was shipped Site 3 B. EPA ID No. of facility to which waste was shipped Site 3 B. EPA ID No. of facility to which waste was shipped C. Off-site Mathod of Method of Method columns and the shipped of	Adaptement D. Total quantity shipped in 2015 Management ode shipped to D. Total quantity shipped in 2015 Management ode shipped to D. Total quantity shipped in 2015 Management ode shipped to D. Total quantity shipped in 2015 Management ode shipped to D. Total quantity shipped in 2015 Management D. Total quantity shipped in 2015											
On-site Management Method code Precycled on site in 2015 On-site Management Method code Precycled on site in 2015 On-site Management Method of Method code Precycled on site in 2015 On-site Management Method of Method code Precycled on site in 2015 for treatment, disposal, or Precycled On Site in 2015 for treatment, disposal or Precycled On Site in 2015 for treatment, disposal or Precycled On Site in 2015 for treatment, disposal or Precycled On Site in 2015 for treatment, disposal or Precycled On Site in 2015 for treatment, disposal or Precycled On Site in 2015 for treatment, disposal or Precycled On Site in 2015 for treatment, disposa	Adaptement D. Total quantity shipped in 2015 Management ode shipped to D. Total quantity shipped in 2015 Management ode shipped to D. Total quantity shipped in 2015 Management ode shipped to D. Total quantity shipped in 2015 Management ode shipped to D. Total quantity shipped in 2015 Management D. Total quantity shipped in 2015											
On-site Management Method code Recycled on site in 2015 On-site Management Method code Recycled on site in 2015 On-site Management Method of Method code Recycled on site in 2015 On-site Management Method of Method code Recycled on site in 2015 or treatment, disposal, or Paragraphy of Paragraphy of Paragraphy of Paragraphy of Paragraphy on Site 1 B. EPA ID No. of facility to which waste was shipped On-site Method code Recycled Site 2 B. EPA ID No. of facility to which waste was shipped On-site Method code Recycled Site 3 B. EPA ID No. of facility to which waste was shipped On-site Method code Recycled Site 3 B. EPA ID No. of facility to which waste was shipped On-site Method code Recycled On site in 2015 or treatment, disposal, or On-site Method code Recycled On site in 2015 for treatment, disposal, or On-site Method of Code Recycled On site in 2015 for treatment, disposal, or On-site Method on Inches Inche	Adaptement D. Total quantity shipped in 2015 Management ode shipped to D. Total quantity shipped in 2015 Management ode shipped to D. Total quantity shipped in 2015 Management ode shipped to D. Total quantity shipped in 2015 Management ode shipped to D. Total quantity shipped in 2015 Management D. Total quantity shipped in 2015											

OR ENT	BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER: SITE NAME: The Dial Corporation The Dial Corporation The Dial Corporation GM FORM WASTE GENERAL											TON AGENCY			
EPA ID I	EPA hazardous waste code(s) D 0 0 1							J	FORM WASTE GENERATION AND MANAGEMENT						
Sec. 1	A. Wa	ste description	1: Lab p	ack san	nples o	f Flamn	mable Esterq	uat Q	uarternary Ammo	nium Compour	nd containing up to 15	% Ethanol			
B. EPA	hazard	ous waste coo	le(s)	12/0/20		20 20		C.	State hazardou	is waste code	e(s)				
D	0 0	1		ـــا لــ		\perp									
L						\perp									
D. Sour	rce code	9				E. Fo	rm code	F.	Quantity genera	ited in 2015		G. Waste			
G	1 9					w	0 0 1			3	81.0	minimization code			
Manage	ment M	lethod code fo	r Sour	ce code	e G25			1	JOM 1			X			
ımanage		ı ı	Oou	00 000	020										
	$\perp \perp$		20						ensity	_!	□ lbs/gal □ sg				
Sec. 2	Was a	any of this was ☐ Yes (CO	NTINU	E TO					ed, disposed, an M 1)	d/or recycled	on site?)			
		ON-SITE F	ROCE	ESS SY	STEN	11				ON-SITE PROCESS SYSTEM 2					
On-site I Meth	Manage od code			antity to			osed, or 015		On-site Manag Method cod		Quantity treated, d recycled on site				
[н]					11	1	<u> </u>		[H] <u> </u>						
Sec. 3	A. Was	any of this wa ■ Yes (CON □ No (FORM	TINUE	TO IT	EM B)		15 for treatn	nent,	disposal, or red	cycling?					
Site 1	B. EP	A ID No. of fa	cility to	which	waste	was s	shipped		C. Off-site Ma		D. Total quantity	shipped in 2015			
2	LP L	A D 0	8	5 6	9	0	5 9	2	Method code	6 1		3 8 0			
Site 2	B. EP	A ID No. of fa	cility to	which	waste	was s	shipped		C. Off-site Ma	nagement	D. Total quantity	shipped in 2015			
									Method code	shipped to	نسيا				
Site 3	B. EP	A ID No. of fa	cility to	which	waste	was s	hipped		C. Off-site Ma		D. Total quantity	shipped in 2015			
	ш			_ _		Ш			Method code	shipped to					
Commen									1						
Lab pack	from che	emical retains. V	Vaste is	blende	d into a	ilternati	ive fuel off-sit	te.							

U.S. Postal Service (CERTIFIED MAIL M RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.coms

OFFICIAL USE

Postage \$ / 40

Certified Fee 3.355

Return Receipt Fee (Endorsement Required)

Restricted Delivery Fee (Endorsement Required)

Total Postage & Fees (7.50)

Sent To: Sent To: Not, 1050 ARCh St

City, State, ZiP+4 Phil Abelphia A 19103 2009

PS Form \$500, June 2002



Satellite Accumulation Site for Aerosol Can Waste



90-day accumulation Site for Lab Waste

July 13, 2017

Lehigh Valley Hospital 700 East Broad Street Hazleton, PA 18201

RE:

Emergency Response, Fire Prevention & RCRA Contingency Plan

The Dial Corporation 125 Jaycee Drive West Hazleton, PA 18202

Dear Sir/Madam:

Enclosed you will find the Emergency Response, Fire Prevention and RCRA Contingency Plan for The Dial Corporation, a Henkel Company located in West Hazleton.

If you have any questions, please feel free to contact me at 570-455-9980 ex 120, or at james.babula@henkel.com.

Sincerely,

James Babula

U.S. Postal Service _{TM} CERTIFIED MAIL _{TM} RECEIPT (Domestic Mail Only; No Insurance Coverage Provided) For delivery information visit our website at www.usps.com ₀ OF CALUSE Postage \$. Cell Certifled Fee 3.35 Return Receipt Fee (Endorsement Required) Restricted Delivery Fee (Endorsement Required) Total Postage & Fees \$	7
Hazleton, PA 18201 PS Form 3800, June 2002	ons

July 13, 2017

West Hazleton Police Department 122 East Broad Street West Hazleton, PA 18202

RE:

Emergency Response, Fire Prevention & RCRA Contingency Plan

The Dial Corporation 125 Jaycee Drive West Hazleton, PA 18202

Dear Sir/Madam:

Enclosed you will find the Emergency Response, Fire Prevention and RCRA Contingency Plan for The Dial Corporation, a Henkel Company located in West Hazleton.

If you have any questions, please feel free to contact me at 570-455-9980 ex 120, or at james.babula@henkel.com.

Sincerely,

James Babula

RATIFIED WALL	U.S. Postal Service TW CERTIFIED MAIL TM RECEIPT (Domestic Mail Only; No Insurance Coverage Provided) For delivery information visit our website at www.usps.coma Postage \$ /. U/ Postage \$ /. U/ Return Receipt Fee (Endorsement Required) Restricted Delivery, Fee (Endorsement Required) Total Postage & Fees \$ 7.71
Rapud and a	West Hazleton Police Department or PO 22 East Broad Street City, West Hazleton, PA 18202

July 13, 2017

West Hazleton Fire Department 12 South 4th Street West Hazleton, PA 18202

RE:

Emergency Response, Fire Prevention & RCRA Contingency Plan

The Dial Corporation 125 Jaycee Drive West Hazleton, PA 18202

Dear Sir/Madam:

Enclosed you will find the Emergency Response, Fire Prevention and RCRA Contingency Plan for The Dial Corporation, a Henkel Company located in West Hazleton.

If you have any questions, please feel free to contact me at 570-455-9980 ex 120, or at james.babula@henkel.com.

Sincerely,

James Babula

I BIGHT O LINE	H608 098	19	U.S. Postal Service TM CERTIFIED MAIL TM RECEIPT (Domestic Mail Only; No Insurance Coverage Provided) For delivery information visit our website at www.usps.com O Fat Fat C A L U S E	
TOP OF ENVELOPE TO THE MADE OF THE MADE OF THE OFFICE OFFICE OFFICE OFFICE OFFICE OFFICE OFFICE OF THE OFFICE OFFI	570 0005 72	510 0005 72	Postage \$ 1, 61 Certified Fee 3.35 Postmark Here Restricted Delivery Fee (Endorserment Required) Restricted Delivery Fee (Endorserment Required)	
PLACE STICKER AT OF THE RETURN A CERTI	7004 25.	'n	Total Postage & Fees \$ 1.71	us

July 13, 2017

Luzerne County EMA 185 Water Street Wilkes Barre, PA 18711

RE:

Emergency Response, Fire Prevention & RCRA Contingency Plan

The Dial Corporation 125 Jaycee Drive West Hazleton, PA 18202

Dear Sir/Madam:

Enclosed you will find the Emergency Response, Fire Prevention and RCRA Contingency Plan for The Dial Corporation, a Henkel Company located in West Hazleton.

If you have any questions, please feel free to contact me at 570-455-9980 ex 120, or at james.babula@henkel.com.

Sincerely,

James Babula

TICKER AT TOP OF ENVELOPE TO THE RIGHT RETURN ADDRESS, FOLD AT DOTTED LINE TO THE TOTAL POTTED IN THE TOTA		2510 0005 7260 8070 2510 0005 7260 8070	U.S. Postal Service TM CERTIFIED MAIL TM RECEIPT (Domestic Mail Only; No Insurance Coverage Provided) For delivery information visit our website at www.usps.coms OFFICAL USE Postage Certified Fee 3, 35 Return Receipt Fee (Endorsement Required) Restricted Delivery Fee (Endorsement Required) Total Postage & Fees \$7.7/
Jance Hab	Some definition of the state of	4007 4007	Ser Luzerne County EMA Sira 185 Water Street City Wilkes-Barre, PA 18711 PS Form 3800, John 2002 See Reverse for Instructions

July 13, 2017

Greater Hazleton Joint Sewer Authority Pretreatment Coordinator P.O. Box 651 Hazleton, PA 18201-0651

RE:

Emergency Response, Fire Prevention & RCRA Contingency Plan

The Dial Corporation 125 Jaycee Drive West Hazleton, PA 18202

Dear Sir/Madam:

Enclosed you will find the Emergency Response, Fire Prevention and RCRA Contingency Plan for The Dial Corporation, a Henkel Company located in West Hazleton.

If you have any questions, please feel free to contact me at 570-455-9980 ex 120, or at james.babula@henkel.com.

Sincerely,

James Babula

U.S. Postal Service TM CERTIFIED MAIL TM RECEIPT (Domestic Mail Only; No Insurance Coverage Provided) For delivery information visit our website at www.usps.coms Postage \$ 1.64 Certified Fee 3.355 Return Receipt Fee (Endorsement Required) Restricted Delivery Fee (Endorsement Required) Total Postage & Fees \$ 771 Pretreatment Coordinator Gr. Hazleton Jt. Sewer Authority PO Box 652 Hazleton, PA 18201	CERTIFIED MAIL (Domestic Mail Only; No Interpretation Visit of Control of Con	RECEIPT surance Coverage Provided) ur website at www.usps.coms Le 1 35 75 This is a surance Coverage Provided) linator ver Authority
--	--	---

_
(e)
1 =
\위/

Taining Total hours West Hazleton Start Time(s): Tuition: (Nemdor address / location – if known) Nethod of Delivery: Start Time(s): Tuition: (Nemdor address / location – if known) Nethod of Delivery: Start Starting Chargeback cost to participant) Address of training company) Nethod of Delivery: Starting of Chargeback cost to participant) Nethod of Delivery: Starting of Chargeback cost to participant) Nethod of Delivery: Starting of Chargeback cost to participant) Nethod of Delivery: Starting of Chargeback cost to participant) Nethod of Delivery: Starting of Chargeback cost to participant) Nethod of Delivery: Starting of Chargeback cost to participant) Nethod of Delivery: Starting of Chargeback cost to participant) Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participant Nethod of Delivery: Starting of Chargeback cost to participa	Henkel		Training Attendance Record	lance Record		Cover Page - Required.
time this class is delivered.) Start Time(s): End Time(s): Total hours leton Tuition: NA Vendor address / location – if known) Tuition: NA Vendor Timoice / Training training training (Chargeback cost to participant) Wethod of Delivery: Eleason cost) Wethod		aste Training			CEUs:	
Start Time(s): Total hours	(Please use the s	same title each time this	dass is delivered)			(If applicable)
Tution: NA	Weight Weight			End Time(s):	101	al hours:
Tuition: NA Vendor address / location – if known Trainer's		West Hazleton	☐ Off-site		Business Unit:	
Trainer's Training company) Trainer's Training training training training) Training training training) Training training training Training training Training training Training training Training training Training training Training training Training training Training training Training training Training training Training training Training training Training training Training training training Training training training Training training Training training training Training training training training Training training training training training training training Training train	⊠ Henkel	'endor		-		
Tuition: NA Vendor Invoice / Trainer's	The special and the special an	(Name of t	raining company)	(Vendor addre	s / location – if known)	Manager (100) (i.e.) on the distribution of the angle of
### (Chargeback cost to participant) Method of Delivery: Eleasmoon Method of Delivery: Eleasmoon Method of Delivery: Eleasmoon Chargeback cost to participant	Henkel Contact: NA		4	Vendor Invoice Material Cost	1	122 25 24
Personal Dev. State	(Name of Henk	ikel person organizing tr			ndicate if total or per person co	and the second s
Signature	Instructor(s): Tony Swetz an	nd Dan Dule		Method		
Engineering / Equipment	(Include (Include Categorize this training:	Global (employee) ID # (Check one)	(s) if Henkel employee(s))	And Andrew Control		
Signature Global (Employee) ID Supervisor Hill	☐ Chemical / Product Training ☐ Communication / Presentat	g Enginee tions 🔲 Genera				
	PARTICIPANTS Print Full Legal Name (as it appear	ars on paycheck)	Signature	Global (Employee) ID	Supervisor	Hire Date
lician Attutational four flowed 20101403 Dule 4anager 02073298 Surmick logist 20012329 SDule nician 20120667 Dule nician 20046815 Dule nician 02073270 Dule Incian 02073329 Dule Incian 02073357 Dule Incian Special Instructions for data entry: Dule Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680. Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680.	1.Berdanier,Richard QA te	chnician	man ha	02073344	Dule	1/15/03
Aanager 02073298 Surmick logist 20012329 SDule sician 20120667 Dule nician 20046815 Dule nician 02073270 Dule nician 02073329 Dule nician 02073329 Dule nician 02073357 Dule nician Special Instructions for data entry: Dule Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680. Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680.		schnician	Dina	20101403	Dule	5/18/15
logist 20012329 SDule SDule ician 20120667 Dule Dule ician 20046815 Dule Dule ician 20073270 Dule Dule ician 20073270 Dule Dule ician Special Instructions for data entry: Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680.		ty Manager		02073298	Surmick	1/31/00
itician		biologist		20012329	SDule	7/29/09
ician 20046815 Dule ician 20073270 Dule in. 0207329 Dule ician 2018 Special Instructions for data entry: Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680.		chnician	Allow 1911.	20120667	Dule	71/12/2
nician		chnician	1	20046815	Dule	2/19/13
ician HH (Mn and 02073329 Dule nician (Done 02073295 Dule 02073357 Dule O2073357 Dule O207357 Dule O207357 Dule O207357 Dule O		schnician		02073270	Dule	11/4/96
in. 1. O2073295 Dule 1. O2073357 Dule Dule N Renewal Date: 2018 Special Instructions for data entry: Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680.		chnician	10	02073329	Dule	10/2/90
ician (1) Dule Dule 02073357 Dule Dule Dule N Renewal Date: 2018 Special Instructions for data entry: Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680.		dmin.		02073295	Dule	11/1/99
N Renewal Date: 2018 Special Instructions for data entry: Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680.		chnician	porno de hi	02073357	Dule	7/1/03
Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680.	Does this training require renewal?		1	ons for data entry:		
		Submit an e		ortal) or fax a copy to HRDirect at	632-859-1680.	

1	₩	١
1	홏	
1	e	
1	王	

Training Attendance Record

Use if additional pages are needed.

Course Title:

Date(s):

(Please use the same title each time this class is delivered)

(If applicable) CEUs:

Total hours:

End Time(s):

Start Time(s):

	3/25/96	3/2/88	10/20/14																	
Hire Date	3/2	3/.	10																	
Supervisor	Babula,J	Dule	Dule																	
Global (Employee) ID (Required)	02073257	02073199	20089721																	
Signature	Some hance	De.	10 Severy 1112																	
PARTICIPANTS Print Full Legal Name (as it appears on paycheck)	SHEQ Manager	QA technician	QA technician				6							3						
PARTICIPANTS Print Full Legal Name (a:	1.Surmick,Janine M	2.Thomas,Mary E	3.Wenner,Morgan S	4.	5.	6.	7.	8.	6.	10.	11.	12.	13.	14.	15.	16.	17.	18.	19.	20.

(Henkel)	Training Attendance Record	ance Record		Cover Page - Required.
Course Title: Hazardous Waste Training	raining		CEUS:	
(Please use the same tit	(Please use the same title each time this class is delivered)		A COLOR OF THE STATE OF THE STA	(If applicable)
Date(s): July 17, 2017	Start Time(s):	End Time(s):	Total	Total hours:
Location: Henkel facility We	West Hazleton □ Off-site		Business Unit:	В&L
Provider: ⊠ Henkel ☐ Vendor			arrangement of the control of the co	
	(Name of training company)	(Vendor address	(Vendor address / location – if known)	
Henkel Contact:	Tuition:	Vendor Invoice / Material Cost		Trainer's
(Name of Henkel pers	(Name of Henkel person organizing training) (Chargeback cost to participant)	Service of the servic	(indicate if total or per person cost)	
Instructor(s): Tony Swetz and Dan Dule	Dule	Method of Delivery:	Delivery: ⊠ dassroom	m Virtual
(Include Global (employ Please categorize this training: (Check one)	(Include Global (employee) ID #(s) if Henkel employee(s))		A STATE OF THE STA	
☐ Chemical / Product Training☐ Communication / Presentations	☐ Engineering / Equipment ☐ HR & Legal ☐ General Business Admin. ☐ IT / Computer	al Languages	☐ Personal Dev. ☐ Sales / Mktg.	SHE & QualityStrategic Mgmt.
PARTICIPANTS Print Full Legal Name (as it appears on paycheck)	Signature // /	Global (Employee) ID (Required)	Supervisor	Hire Date
1. Andrews, Shawn Processing technician	schnician	02073352	Williams	4/28/03
2. Hess,Stephen L Processing technician	d	02073276	Williams	10/5/98
3. Hoch, Brian Processing technician	echnician	02073259	Williams	4/29/96
4. Kripp Jr., Michael F Processing technician	echnician M	02073288	Williams	7/26/99
5. Lashock, Thomas Processing technicial Specialist	echnicial (02073224	Williams	12/19/89
6. Mott, Thomas Processing technician	echnician C	02073247	Williams	16/11/6
7. Shafer, Connie Processing technician	echnician () Lu y	02073210	Williams	7/11/88
8. Vuolo,Sandra L Processing technician	achnician Charles	02073239	Williams	2/22/91
9. Aliyow.Yonis Process Engineer	neer Carteria	20120373	Williams	2/20/17
10. Wiliams, Michael Processing Manager	anager Malue 14. 11th	02073309	J.Babula	11/13/00
Does this training require renewal? 🛮 Y 🔲 N	Renewal Date: 2018 Special Instructions for data entry:	for data entry:		
	Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680.	il) or fax a copy to HRDirect at 63	32-859-1680.	
Training Attendance Record Form 7/1/2011	BET#:	BE#:		Dane 1 - Cover Dane

Page 1 - Cover Page

BE#:

_	F
(<u>e</u>)	, e
\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \	3
(Ĭ)	ී
$\overline{}$	

Course Title: Hazardous Waste Training (Please use the same title each time this class is delivered) Date(s): July 17, 2017 Start Time(CEUs:	
(Please use the same title each time this dat July 17, 2017				
July 17, 2017	iss is delivered)		And the second state of the second se	(If applicable)
	Start Time(s):	End Time(s):	Tota	Total hours:
Location: Menkel facility West Hazleton	□ Off-site		Business Unit:	B&L
Provider: 🔻 🖂 Henkel 🔲 Vendor				
(Name of training company)	ing company)	(Vendor address	s / location – if known)	
Henkel Contact:	Tuition:	Vendor Invoice / Material Cost		Trainer's Transp. Cost:
(Name of Henkel person organizing training)	ng) (Chargeback cost to participant)		or per person	st) (if known)
Instructor(s): Tony Swetz and Dan Dule		Method of Delivery:	f Delivery: 🖂 Classroom	oom Virtual
(Include Global (employee) ID #(s) if Henkel	if Henkel employee(s))	A STATE OF THE STA		
riease categorize unis training: (Check one) ☐ Chemical / Product Training ☐ Engineering / Equipment	Engineering / Equipment HR & Legal	al Languages	S	SHE & Quality
PARTICIPANTS]	I (Emplo	Supervis	Hire Date
1. Kaufman, William Processing technician	Min Wille	(Required) 02073317	Williams	7/2/01
2. Kopp, Timothy W Processing technician	Autan June	02073272	Williams	7/13/98
3. Leigh Lizbinski Processing technician	200	02073363	Williams	9/29/03
4. Monigas, George J Processing technician		02073333	Williams	6/3/02
5. Ruggiero, Marie Processing technician	Marie Rucoum	02073258	Williams	4/15/96
6. Seely, Kent W Processing technical specialist		20034679	Williams	10/26/11
7. Stefanick, Scott D Processing technician	MA	20038408	Williams	3/28/12
Š				
ó				
10.				
Does this training require renewal? 🛛 Y 🔲 N Renewal Date: _2018	2018 Special Instructions for data entry:	s for data entry:		
Submit an electro	Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680	al) or fax a copy to HRDirect at 6	32-859-1680.	
Training Attendance Record Form 7/1/2011 BET#:		BE#:		Page 1 - Cover Page

Course Title: Haza	Hazardous Waste Training			CEUS:	÷4.
	(Please use the same title each time the	this class is delivered)		regions are a consider	(If applicable)
Date(s): July 17, 2017	17	Start Time(s):	End Time(s):	Tota	Total hours:
Location: Henkel facility	l facility West Hazleton	n Off-site		Business Unit:	B&L
Provider:	S □ Vendor			And the second s	
The state of the s	(Name of	(Name of training company)	(Vendor address	(Vendor address / location – if known)	
Henkel Contact:		Tultion:	Vendor Invoice / Material Cost	130. 1	Trainer's
	(Name of Henkel person organizing training)	training) (Chargeback cost to participant)		(indicate if total or per person cost)	t) (if know
Instructor(s): Tony §	Tony Swetz and Dan Dule		Method of	Method of Delivery:	om Virtual
(Include Global (employ Please categorize this training: (Check one)	(Include Global (employee) ID #(s) if Henkel employee(s)) raining: (Check one)	#(s) if Henkel employee(s))			
☐ Chemical / Product Training ☐ Communication / Presentations	ct Training	Engineering / Equipment ☐ HR & Legal General Business Admin. ☐ IT / Computer	gal Languages	☐ Personal Dev. ☐ Sales / Mktg.	SHE & Quality Strategic Mgmt.
PARTICIPANTS Print Full Legal Name (a	PARTICIPANTS Print Full Legal Name (as it appears on paycheck)	Signature	Global (Employee) ID (Required)	Supervisor	Hire Date
1. Bodnar, Christopher	Processing technician	Chi Bro	20095142	Williams	1/5/15
2. Boehmer, Marlin specialist	Processing technical	My Boehwee	20098860	Williams	4/29/15
3. Bradley, Mark R	Processing technician) 20005387	Williams	10/13/08
4. Craddock, Brian	Processing technician	Brown narles	20086060	Williams	3/4/14
5. Johnson, Kelli	Processing technician	May (14)	20118180	Williams	11/29/16
6. Mohart, James W	Processing technician	Time while	20005390	Williams	11/13/08
7.				Williams	
8.		1			
6.					
10.					
Does this training require renewal? 🛛 Y	z	Renewal Date: 2018 Special Instruction	Special Instructions for data entry:		
	Submit an	Submit an electronic copy to <u>HRDirect</u> (via the portal) or fax a copy to HRDirect at 632-859-1680	tal) or fax a copy to HRDirect at 63	2-859-1680.	

(if known)

Page 1 - Cover Page

Henkel	Training Attendance Record	lance Record		Cover Page - Required.
Course Title: Hazardous Waste Training			CEUS:	12.16
(Please use the same title each time this class is delivered)			And the state of t	(If applicable)
Date(s); July 17,2017	Start Time(s):	End Time(s):	Tota	Total hours:
Location: 🛭 Henkel facility West Hazleton	າ ⊡ Off-site		Business Unit:	B&L
Provider: Henkel Vendor				· · · ·
(Name of	(Name of training company)	(Vendor address,	(Vendor address / location – if known)	
Henkel Contact:	Tuition:	Vendor Invoice / Material Cost		Trainer's
(Name of Henkel person organizing training)	training) (Chargeback cost to participant)		(indicate if total or per person cost)	t) (if known)
Instructor(s): Tony Swetz and Dan Dule		Method of Delivery:	Delivery: ⊠ Classroom	om Virtual
(Include Global (employee) ID #(s) if Henkel employee(s)) Please categorize this training: (Check one)	#(s) if Henkel employee(s))			
Chemical / Product Training ☐ Engineering / E☐ Communication / Presentations ☐ General Busine	Engineering / Equipment	gal 🔲 Languages nputer 🔲 Leadership	☐ Personal Dev. ☐ Sales / Mktg.	SHE & QualityStrategic Mgmt.
PARTICIPANTS Print Full Legal Name (as it appears on paycheck)	Signature	Global (Employee) ID (Required)	Supervisor	Hire Date
1. Longazel, Gregory Facilities specialist	,	02073216	Sweeney	1/23/89
2. Swetz, Anthony Environmental Coordinator	M	02073268	Sweeney	96/8/L
3. Trubilla,John M Facilities specialist	gir julle	02073221	Sweeney	5/1/89
4.				
5.				
6.				
7.				
8.				
9.				
10.				
Does this training require renewal? 🛛 Y 📋 N 👚 Renewal 🛘	Renewal Date: 2018 Special Instruction	Special Instructions for data entry:		
Submit an	Submit an electronic copy to <u>HRDirec</u> t (via the portal) or fax a copy to HRDirect at 632-859-1680.	tal) or fax a copy to HRDirect at 63	2-859-1680.	
Training Attendance Record Form 7/1/2011	BET#:	BE#:		Page 1 - Cover Page

/	<u>a</u>	
1	~	
b	5	
١	<u>e</u>	
١	1	

(Henkel)	Training Attendance Record	nce Record		Cover Page - Required.	1888
Course Title: Hazardous Waste Training			CEUS:		
(Please use the same title each time this class is delivered)	elivered)		Control of the Contro	(If applicable)	
Date(s): July 17, 2017 Start	Start Time(s):	End Time(s):	Tota	Total hours:	
Location: 🛭 Henkel facility West Hazleton	□ Off-site		Business Unit:	B&L	
Provider: Nenkel Vendor					
(Name of training company)	npany)	(Vendor address	(Vendor address / location - if known)		1
Henkel Contact:	Tuition:	Vendor Invoice / Material Cost	ĖĖ	Trainer's Transp. Cost:	
(Name of Henkel person organizing training)	(Chargeback cost to participant)		indicate if total or per person cost)	ost) (if known)	
Instructor(s): Tony Swetz and Dan Dule		Method of Delivery:	Delivery: ⊠ Classroom	oom 🔲 Virtual	
(Include Global (employee) ID #(s) if Henkel employee(s)) Please categorize this training: (Check one)	el employee(s))	يان المجاور والم المراجع المرا			
☐ Chemical / Product Training ☐ Engineering / Equipment ☐ Communication / Presentations ☐ General Business Admin.	uipment	l Languages	☐ Personal Dev. ☐ Sales / Mktg.	SHE & QualityStrategic Mgmt.	
PARTICIPANTS Signature Print Full Legal Name (as it appears on paycheck)		Global (Employee) ID (Required)	Supervisor	Hire Date	
1. Ansbach, Michael Maintenance Manager	{	20081364	Balula, J	8/26/13	
2. Babula, James Operations Manager Beauty Care / Laundry Care	V.80	20026500	Newton	1/31/11	
3. Dule, Daniel P Quality Manager	7	02073298	Surmick	1/31/00	T:
4. Gestl III, Frederick F Manager SHE Beauty and Laundry	No.	02073387	Surmick	90/5/9	
5. Howard, Mark Continuous Improvement Total Productive Maintenance (TPM plus)	The same	02073426	Balula,J	6/26/96	
6. Jarosh, Jonathan P Microbiologist		20012329	Surmick	7/29/09	
7. Kelly,Kristin Team Manager Packaging	the Collins	20110652	Balula, J	5/32/16	
8. Solarek, Gerald Continuous Improvement Manager	P	20122844	Howard	5/8/17	
9. Ledoux,Starla J Team Manager Packaging		20038467	Balula, J	4/9/12	
10. Shipton, Lawrence E Manager Materials and Logistics Operations	un Make	02073393	Babula, J	90/2/6	
Does this training require renewal? 🛛 Y 🔲 N Renewal Date: 2018	Special Instructions for data entry:	for data entry:			
Submit an electronic α	opy to <u>HRDirect</u> (via the portal	Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680	12-859-1680.		

Training Attendance

	-	
/	e	1
ı	츳	
١	ē	Ì,
١	I	1

Training Attendance Record

Use if additional pages are needed.

Course Title:

Date(s):

(Please use the same title each time this class is delivered)

Start Time(s):

.

CEUS: (If applicable)

Total hours:

End Time(s):

se)	Signature	Global (Employee) ID (Required)	Supervisor	Hire Date
1.Surmick,Janine M SHEQ Manager		02073257	Balula, J	3/25/96
2.Sweeney Jr., Christopher J Engineering Manager	TANK TO THE PARTY OF THE PARTY	02073250	Balula,J	1/27/92
3.Taber,Kevin Area Manager Packaging		20124242	Babula,J	6/26/17
4				
2.				
9				
7.		5		
ŵ				
ő				
10,				
11.				
12.				
13.				
14.				
15.				
16.				
17.				•
18.				
19.				
20.				

Hazardous Waste Training Please use the same title each time this class is delivered) Start Time(s): End Start Time(s): Start Time(s): End Shart Time(s): Chargeback cost to participant)	CEUS: (If app. Total hours:	ier i
Please use the same title each time this class is delivered		
Start Time(s): End		(If applicable)
Henkel facility West Hazleton Confr-site Henkel Convert Convert Confreshment Con		hours:
Chame of training company)	Business Unit:	B&L
(Name of training company) (Name of Henkel person organizing training) (Chargeback cost to participant) Tony Swetz and Dan Dule (Include Global (employee) ID #(s) if Henkel employee(s)) rize this training: (Check one) cal / Product Training		
Tuition: (Name of Henkel person organizing training) (Chargeback cost to participant) Tony Swetz and Dan Dule (Include Global (employee) ID #(s) if Henkel employee(s)) rize this training: (Check one) cal / Product Training unication / Presentations	/ location – if known)	The state of the pole way by way and for the pole
(Name of Henkel person organizing training) (Chargeback cost to participant) Tony Swetz and Dan Dule (Include Global (employee) ID #(s) if Henkel employee(s)) rize this training: (Check one) cal / Product Training		Trainer's Transp. Cost:
Tony Swetz and Dan Dule (Include Global (employee) ID #(s) if Henkel employee(s)) rize this training: (Check one) cal / Product Training: (Check one) Caparage	(indicate if total or per person	(if known
Engineering / Equipment	Method of Delivery: ⊠ Classroom	n Uirtual
Engineering / Equipment		
Attice of the second se	☐ Languages ☐ Personal Dev. ☐ Leadership ☐ Sales / Mktg.	SHE & Quality Strategic Mgmt.
Satino, Amy E Team Manager eduling / Material Planning Saydoscik, James E Project Manager One CL SAP MD/MM (4.1) 8 LVM CL Manager One Manager, Cory A Human Resources	Supervisor	Hire Date
Satino, Amy E Team Manager Satino, Amy E Team Manager Saydoscik, James E Project Manager One St. J. SAP MD/MM (4, 1) 8 LVM LL MARCH MANAGER MANAGER, Cory A Human Resources	8,000	3/200
Saydoscik, James E Project Manager One C! SAP MD/MM (4.1) 8 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Shipton	2/13/12
du.) 8 Lym L. Human Resources Call	Shipton	7/26/99
Human Resources / Call	Sweeny	1212
Manager	CUNTING TOWN	9/12/11
6. McKinley, Rosemarie C Admin. Assistant / Admy Jegn 4 02073253	Hunsinger	8/16/93
7. Paris, William E Programmer Analyst A 02073308	Sweeney	9/28/00
8. Slusser, Bridget M Finance Manager 20034734	Babula,F	11/7/11
9. Willis, Leanne E Employee Relations (20072364)	Hunsinger	3/11/96
10 Tobes Kevin		

1 - Cover Page

Submit an electronic copy to HRDirect (via the portal) or fax a copy to HRDirect at 632-859-1680.

Training Attendance R

(if known)

	9 1
1	=
١	Ø.
	エノ

Training Attendance Record

Use if additional pages are needed.

Course Title:

Date(s):

(Please use the same title each time this class is delivered)

Start Time(s):

End Time(s):

(If applicable) CEUS:

Total hours:

			T	T	T						T		T		T					1
Hire Date																				
Supervisor	Sichore) [20			
Global (Employee) ID	(Kequired)																			
Signature		1						c												
PARTICIPANTS Drint Full Local Name (as it amount on auchods)	1. Ste Shelfel	2.	3.	4.	5.	9	7.	8	.6	10.	11.	12.	13.	14.	15.	16.	17.	18.	19.	20.

RECEIVED

BEFORE THE UNITED STATES 2017 DEC 20 AM 9: 06 ENVIRONMENTAL PROTECTION AGENCY REGION III REGIONAL HEARING CLERG EPA REGION III, PHILA PA

In the Matter of:

Dial Corporation 125 Jaycee Drive West Hazleton, PA 18201

Respondent

CONSENT AGREEMENT

125 Jaycee Drive West Hazleton, PA 18201

Facility

Proceeding under RCRA Section 3008(a)(1) and (g), 42 U.S.C. § 6928(a)(1) and (g)

Docket No. RCRA-03-2018-0016

CONSENT AGREEMENT

I. PRELIMINARY STATEMENT

- This Consent Agreement is entered into by the Director of the Land and Chemicals Division, U.S. Environmental Protection Agency, Region III ("Complainant"), and Dial Corporation ("Respondent"), pursuant to Section 3008(a)(1) and (g) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6928(a)(1) and (g), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/ Termination or Suspension of Permits ("Consolidated Rules of Practice"), 40 C.F.R. Part 22.
- 2. The Consolidated Rules of Practice, 40 C.F.R. § 22.13(b), provide in pertinent part that, where the parties agree to settlement of one or more causes of action before the filing of a complaint, a proceeding simultaneously may be commenced and concluded by the issuance of a Consent Agreement and Final Order pursuant to 40 C.F.R. § 22.18(b)(2) and (3). Pursuant thereto, this Consent Agreement and the accompanying Final Order (collectively referred to herein as the "CAFO"), simultaneously commences and concludes this administrative proceeding against Respondent Dial Corporation.
- 3. This CAFO addresses Respondent's violations of RCRA Subtitle C, 42 U.S.C. §§ 6921-

6939f, various regulations promulgated thereunder as set forth at 40 C.F.R. Parts 260-266, 268, and 270-73, and the authorized Pennsylvania Hazardous Waste Management Regulations, 25 Pa. Code Sections 260a - 266a, 266b, and 268a – 273a ("PaHWMR") that occurred at the Respondent's facility located at 125 Jaycee Drive, West Hazleton, Pennsylvania 18201 ("Facility").

- 4. The Commonwealth of Pennsylvania has received federal authorization to administer a Hazardous Waste Management Program (the "Pennsylvania Hazardous Waste Management Program") in lieu of the federal hazardous waste management program established under RCRA Subtitle C, 42 U.S.C. §§ 6921-6939f. Effective January 30, 1986, the Commonwealth of Pennsylvania Hazardous Waste Management Regulations ("PaHWMR") were authorized by the U.S. Environmental Protection Agency ("EPA") pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), and 40 C.F.R. Part 271, Subpart A. The PaHWMR subsequently were revised, and thereafter re-authorized by EPA, on September 26, 2000, January 20, 2004, and April 29, 2009. Such authorized revised PaHWMR requirements and provisions became effective on November 27, 2000, March 22, 2004, and June 29, 2009, respectively. The PaHWMR incorporate, with certain exceptions, federal hazardous waste management regulations that were in effect as of May 1, 1999 (and as of July 6, 1999 for certain regulations regarding Universal Waste) for the November 27, 2000 PaHWMR authorization, June 28, 2001 for the March 22, 2004 PaHWMR authorization, and October 12, 2005 for the April 29, 2009 PaHWMR authorization. The provisions of Pennsylvania's current authorized PaHWMR, codified at 25 Pa. Code Chapters 260a-266a, 266b, and 268a-270a, have thereby become requirements of RCRA Subtitle C and are enforceable by EPA pursuant to RCRA Section 3008(a) of RCRA, 42 U.S.C. § 6928(a).
- 5. Upon making a determination that any person has violated or is in violation of any requirement of RCRA Subtitle C and satisfying the notification requirements of RCRA Section 3008(a)(2), 42 U.S.C. § 6928(a)(2), Section 3008(a)(1) of RCRA, 42 U.S.C. § 6928(a)(1), authorizes the Administrator of EPA to issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both.
- Respondent is, hereby, notified of EPA's determination that Respondent has violated RCRA Subtitle C, 42 U.S.C. §§ 6921-6939e, the regulations promulgated thereunder at 40 C.F.R. Parts 260-266, 268, and 270-73, and the PaHWMR.
- 7. EPA has given the Commonwealth of Pennsylvania, through the Pennsylvania Department of Environmental Protection ("PADEP"), prior notice of the commencement of this civil proceeding in accordance with RCRA Section 3008(a)(2), 42 U.S.C. § 6928(a)(2).

II. GENERAL PROVISIONS

- 8. For purposes of this proceeding only, Respondent admits the jurisdictional allegations set forth in this CAFO.
- 9. Except as provided in Paragraph 8, above, Respondent neither admits nor denies the specific

factual allegations and legal conclusions set forth in this CAFO.

- 10. Respondent agrees not to contest the jurisdiction of EPA with respect to the execution of this Consent Agreement, the issuance of the attached Final Order, or the enforcement of this CAFO.
- 11. For purposes of this proceeding only, Respondent hereby expressly waives its right to a hearing on any issue of law or fact in this matter, consents to the issuance of this CAFO without adjudication, and waives its right to appeal the accompanying Final Order.
- Respondent consents to the issuance of this CAFO and agrees to comply with its terms and conditions.
- 13. Respondent and Complainant shall bear their own costs and attorney's fees in connection with this proceeding.

III. EPA FINDINGS OF FACT AND CONCLUSIONS OF LAW

- 14. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice, Complainant alleges the following findings of fact and conclusions of law.
- 15. Respondent is a Delaware corporation doing business in, and with offices and an operating facility located within, the Commonwealth of Pennsylvania, and is a "person" within the meaning of RCRA Section 1004(15), 42 U.S.C. § 6903(15), 40 C.F.R. § 260.10, and 25 Pa. Code Section 260a.10.
- 16. Respondent is and has been, at all times relevant to this CAFO, the owner and operator of a facility, located at 125 Jaycee Drive in West Hazleton, Pennsylvania (the "Facility"), where the Respondent manufactures antibacterial soap and laundry detergent.
- 17. On May 17, 2016, a duly authorized representative of EPA conducted a compliance evaluation inspection ("CEI") of the Facility to assess the Respondent's compliance with the requirements of RCRA Subtitle C, 42 U.S.C. §§ 6921-6939f, the federal regulations promulgated thereunder, and the PaHWMR requirements at the Facility.
- 18. On May 4, 2017, EPA issued a request to show cause letter to Respondent advising it of EPA's findings in regards to potential violations of the requirements of RCRA Subtitle C, 42 U.S.C. §§ 6921-6939f, the federal regulations promulgated thereunder, and the PaHWMR requirements at the Facility, and offering the Respondent an opportunity to provide such additional information as it believed the EPA should review and consider before reaching any final conclusions as to the Respondent's compliance at the Facility. Respondent availed itself of this opportunity and provided additional information in response this request to show cause letter.

COUNT I

(Operating a Hazardous Waste Storage Facility Without a Permit)

- 19. The allegations of Paragraphs 1 through 18 of this Consent Agreement are incorporated herein by reference as though fully set forth at length.
- 20. RCRA Section 3005(a) and (e), 42 U.S.C. Section 6925(a) and (e), and 25 Pa. Code § 270a.1, which incorporates by reference 40 C.F.R. Part 270, provide, in pertinent part, that a person owning and/or operating a facility used for the treatment, storage or disposal of hazardous waste is required to comply with the permitting requirements established by EPA or by a state with an authorized hazardous waste management program, or have interim status for such facility.
- 21. At all times relevant to this Consent Agreement, Respondent generated at the Facility "hazardous waste," as that term is defined by RCRA Section 1004(5), 42 U.S.C. § 6903(5), and 40 C.F.R. §§ 260.10 and 261.3, as incorporated by reference by 25 Pa. Code Sections 260a.1 and 261a.1. See also 25 Pa Code Section 261a.3.
- 22. The Facility was assigned the EPA Identification Number PAD987271012.
- 23. At all times relevant to this Consent Agreement, Respondent was a "generator" of "solid waste" and "hazardous waste" at the Facility as those terms are defined by 40 C.F.R. § 260.10, as incorporated by reference by 25 Pa. Code Section 260a.1.
- 24. At all times relevant to this Consent Agreement, hazardous waste was in "storage" in containers at Respondent's "facility" as those terms are defined by RCRA Section 1004(33), 42 U.S.C. § 6903(33), and 40 C.F.R. § 260.10, as incorporated by reference by 25 Pa. Code Section 260a.1, and 25 Pa. Code Section 260a.10.
- 25. At all times relevant to this Consent Agreement, Respondent was the "owner" and "operator" of a hazardous waste storage facility as those terms are defined by 40 C.F.R. § 260.10, as incorporated by reference by 25 Pa. Code Section 260a.1.
- 26. A "container" is defined to mean "any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled." 40 C.F.R. § 260.10, as incorporated by reference by 25 Pa. Code Section 260a.1.
- 27. At all times relevant to this Consent Agreement, Respondent never possessed a permit or interim status authorizing the treatment, storage or disposal of hazardous waste at the Facility.
- 28. 40 C.F.R. § 262.34(a), which is incorporated by reference by 25 Pa. Code § 262a.10, provides, in pertinent part, that a generator of hazardous waste may accumulate hazardous waste on-site for 90 days or less without a permit or interim status, provided the generator complies with a number of conditions concerning the management of the hazardous waste,

including, but not limited to:

- A. 40 C.F.R. § 262.34(a) incorporates by reference the Contingency Plan requirements of 40 C.F.R. §§ 265.53(b), which requires each facility to submit a copy of the Contingency Plan to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services; and
- B. 40 C.F.R. § 262.34(a) incorporates by reference the management of container requirements of 40 C.F.R. § 265.173(a), which requires that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste;
- On August 30, 2015, the Facility's Contingency Plan had not been submitted to local authorities.
- 30. At the time of the May 17, 2016 CEI, Dial Corporation was accumulating D001 and D003 hazardous waste aerosol cans in an open plastic container in its packaging area and in an open plastic container near the hazardous waste accumulation area. Dial Corporation was not adding or removing waste from these containers at the time of the inspection and therefore, failed to properly manage these two containers of hazardous waste.
- 31. By storing hazardous waste more than 90 days, specifically two drums of D001 and F003 hazardous waste stored on-site from April 26, 2013 to August 5, 2013 (102 days), Respondent failed to satisfy the exemption condition set forth in 40 C.F.R.§ 262.34(a).
- 32. By storing hazardous waste more than 90 days, specifically two drums of D001 and F003 hazardous waste stored on-site from June 18, 2014 to September 18, 2014 (92 days), Respondent failed to satisfy the exemption condition set forth in 40 C.F.R.§ 262.34(a).
- 33. By storing hazardous waste more than 90 days, specifically two drums of D001, D022 and F003 hazardous waste stored on-site from September 19, 2014 to December 23, 2014 (95 days), Respondent failed to satisfy the exemption condition set forth in 40 C.F.R.§ 262.34(a).
- 34. By storing hazardous waste more than 90 days, specifically two drums of D001, D002, D022 and F003 hazardous waste drums stored on-site from February 20, 2015 to June 1, 2015 (102 days), Respondent failed to satisfy the exemption condition set forth in 40 C.F.R.§ 262.34(a).
- 35. By virtue of these actions or failures to act, Respondent failed to satisfy the exemption conditions set forth in 25 Pa. Code § 262a.10, incorporating 40 C.F.R. § 262.34(a) and (c). Respondent owned and/or operated a hazardous waste storage facility without a permit or interim status in violation of Section 3005(a) and (e) of RCRA, 42 U.S.C. § 6925(a) and (e), and 25 Pa. Code § 270a.1, which incorporates by reference 40 C.F.R. §

270.1., on July 25, 2013-August 5, 2013, September 17, 2014-September 18, 2014, December 19, 2014-December 23, 2014, May 21, 2015-June 1, 2015, August 30, 2015, and May 17, 2016.

36. Respondent violated RCRA Section 3005(a) and (e), 42 U.S.C. Section 6925(a) and (e), and 25 Pa. Code § 270a.1, which incorporates by reference 40 C.F.R. § 270.1(b), by owning and operating a hazardous waste storage facility without a permit or interim status.

COUNT II

(Failure to Submit Copies of the Contingency Plan)

- 37. The allegations of Paragraphs 1 through 36 of this Consent Agreement are incorporated by reference as though fully set forth at length.
- 38. 25 Pa. Code § 264a.1 incorporates by reference the Contingency Plan requirements of 40 C.F.R. §§ 264.53(b), which requires each facility to submit a copy of the Contingency Plan to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.
- 39. On August 30, 2015, the Facility's Contingency Plan had not been submitted to local authorities.
- 40. On August 30, 2015, Respondent violated 25 Pa. Code § 264a.1, which incorporates by reference 40 C.F.R. § 264.53(b), by failing to provide a copy of the Contingency Plan to local authorities.

COUNT III

(Open Containers)

- 41. The allegations of Paragraphs 1 through 40 of this Consent Agreement are incorporated by reference as though fully set forth at length.
- 42. 25 Pa. Code § 264a.1 incorporates by reference the management of container requirements of 40 C.F.R. § 264.173(a), which requires that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.
- 43. At the time of the May 17, 2016 CEI, Respondent was accumulating D001 and D003 hazardous waste aerosol cans in an open plastic container in its packaging area and in an open plastic container in its hazardous waste accumulation area.
- 44. At the time of the May 17, 2016 CEI, Respondent had open containers of hazardous waste identified in Paragraph 43, above, at a time when it was not necessary to add or remove waste from the containers.

45. At the time of the May 17, 2016 CEI, Respondent violated 25 Pa. Code Section 264a.1, which incorporates by reference 40 C.F.R § 264.173(a), by maintaining open containers holding hazardous waste at the Facility at a time when it was not necessary to add or remove waste from the containers.

COUNT IV

(Failure to File Biennial Report)

- 46. The allegations of Paragraphs 1 through 45 of this Consent Agreement are incorporated by reference as though fully set forth at length.
- 47. 25 Pa Code § 262a.41 provides that a generator who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must prepare and submit a single copy of a Biennial Report to the PADEP by March 1 of each even numbered year.
- 48. At the time of the May 17, 2016 CEI, Respondent had not filed the hazardous waste biennial reports due on March 1, 2014 and March 1, 2016.
- 49. At the time of the May 17, 2016 CEI, Respondent violated 25 Pa Code § 262a.41 by failing to submit biennial reports due on March 1, 2104 and March 1, 2016.

COUNT V

(Failure to Store Universal Waste Lamps in Closed Structurally Sound Container)

- 50. The allegations of Paragraphs 1 through 49 of this Consent Agreement are incorporated by reference as though fully set forth at length.
- 51. 25 Pa. Code § 266b.1, which incorporates by reference 40 C.F.R. § 273.13(d)(1), requires that a small quantity handler of universal hazardous waste, specifically, universal waste "lamps," store such lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.
- 52. At the time of the May 17, 2016 CEI, Respondent was storing universal waste lamps in a cardboard box that ripped open when the Facility representative moved the box to determine whether a label had been applied to the box.
- 53. At the time of the May 17, 2016 CEI, Respondent violated 25 Pa. Code § 266b.1, which incorporates by reference 40 C.F.R. § 273.13(d)(1), by failing to store universal waste lamps in a closed structurally sound container.

COUNT VI

(Failure to Label Container of Universal Waste Lamps)

- 54. The allegations of Paragraphs 1 through 53 of this Consent Agreement are incorporated by reference as though fully set forth at length.
- 55. 25 Pa. Code § 266b.1, which incorporates by reference 40 C.F.R. § 273.14(e), requires that each lamp, or container or package containing such lamps, must be clearly marked or labeled with one of the following phrases: "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)."
- 56. At the time of the May 17, 2016 CEI, Respondent was storing universal waste lamps in a container that did not have a box checked for Universal Waste Lamps on its label nor did it have any of other form of insignia to denote the storage of universal waste lamps in the container.
- 57. At the time of the May 17, 2016 CEI, Respondent violated 25 Pa. Code § 266b.1, which incorporates by reference 40 C.F.R. § 273.14(e), by failing to clearly mark or label a universal waste lamp container with one of the phases identified in Paragraph 55.

COUNT VII

(Failure to Mark or Demonstrate Accumulation Start Date for Universal Waste Batteries)

- 58. The allegations of Paragraphs 1 through 57 of this Consent Agreement are incorporated by reference as though fully set forth at length.
- 59. 25 Pa. Code § 266b.1, which incorporates by reference 40 C.F.R. § 273.15(c), requires that a small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date that it becomes a waste or has been received.
- 60. 40 C.F.R. § 273.15(c)(1) provides that the handler may make this demonstration by placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received.
- 61. 40 C.F.R. § 273.15(c)(2) though (6) provides that this demonstration may also be made by marking each individual item with the date that it becomes a waste, maintaining an inventory system that identifies the earliest date that items became waste, placing universal waste in specific accumulation areas that identify the earliest date that items became waste, or any other method that clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.
- 62. At the time of the May 17, 2016 CEI, Respondent had not marked nor was it able to identify the accumulation start date for a container of universal waste batteries.

63. At the time of the May 17, 2016 CEI, Respondent violated 25 Pa. Code § 266b.1, which incorporates by reference 40 C.F.R. § 273.15(c), by failing to demonstrate the length of time that the universal waste batteries had been accumulated from the date that the universal waste batteries became a waste.

IV. SETTLEMENT

- 64. In settlement of EPA's claims for civil monetary penalties assessable for the violations alleged in this Consent Agreement, Respondent consents to the assessment of a civil penalty of FORTY-FOUR THOUSAND FIVE HUNDRED AND NINETY-EIGHT DOLLARS (\$44,598.00), which Respondent agrees to pay in accordance with the payment terms set forth in Paragraph 66, below. Such civil penalty amount shall become due and payable immediately upon Respondent's receipt of a true and correct signed copy of this CAFO, fully executed by the parties, signed by the Regional Judicial Officer, and filed with the Regional Hearing Clerk. In order to avoid the assessment of interest in connection with such civil penalty as described in this CAFO, Respondent must pay the civil penalty no later than thirty (30) calendar days after the date on which a copy of this CAFO is mailed or hand-delivered to Respondent.
- 65. The civil penalty settlement amount set forth in Paragraph 64, immediately above, was determined after consideration of the statutory factors set forth in Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), which include the seriousness of the violation and any good faith efforts to comply with the applicable requirements. These factors were applied to the particular facts and circumstances of this case with specific reference to EPA's October, 1990 RCRA Civil Penalty Policy, as revised in June, 2003 ("RCRA Penalty Policy"), which reflect the statutory penalty criteria and factors set forth at Section 3008(a)(3) and (g) of RCRA, 42 U.S.C. §§ 6928(a)(3) and (g). Complainant has also considered the Adjustment of Civil Monetary Penalties for Inflation, 40 C.F.R. Part 19, and the July 27, 2016 Memorandum by EPA Assistant Administrator, Cynthia Giles, entitled, "Amendments to the U.S. Environmental Protection Agency's Civil Penalty Policies to Account for Inflation," (effective August 1, 2016). The settlement in this proceeding is consistent with the provisions and objectives of Section 3008 of RCRA, and its implementing regulations.
- 66. Payment of the civil penalty set forth in Paragraph 64, above, plus any interest, administrative fees, and late payment penalties owed, in accordance with Paragraphs 68 through 71, below, shall be made by either cashier's check, certified check, or electronic wire transfer, in the following manner:
 - All payments by Respondent shall reference Respondent's name and address, and the Docket Number of this action, i.e., RCRA-03-2018-0016;
 - b. All checks shall be made payable to the "United States Treasury;"
 - c. All payments made by check and sent by regular mail shall be addressed to:

U.S. Environmental Protection Agency Cincinnati Finance Center P.O. Box 979077 St. Louis, MO 63197-9000

Primary Contact: Craig Steffen, (513) 487-2091 Secondary Contact: Molly Williams, (513) 487-2076

d. All payments made by check and sent by overnight delivery service shall be addressed for delivery to:

> U.S. Environmental Protection Agency Cincinnati Finance Center Government Lockbox 979077 1005 Convention Plaza SL-MO-C2-GL St. Louis, MO 63101

Primary Contact: Craig Steffen, (513) 487-2091 Secondary Contact: Molly Williams, (513) 487-2076

e. All payments made by check in any currency drawn on banks with no USA branches shall be addressed for delivery to:

> Cincinnati Finance US EPA, MS-NWD 26 W ML King Drive Cincinnati, OH 45268-0001

f. All payments made by electronic wire transfer shall be directed to:

Federal Reserve Bank of New York

ABA: 021030004

Account Number: 68010727 SWIFT address: FRNYUS33

33 Liberty Street New York, NY 10045

Beneficiary: US Environmental Protection Agency

g. All electronic payments made through the Automated Clearinghouse (ACH), also known as Remittance Express (REX), shall be directed to:

US Treasury REX / Cashlink ACH Receiver

ABA: 051036706

Account Number: 310006, Environmental Protection Agency

CTX Format Transaction Code 22 - Checking

Physical location of U.S. Treasury facility: 5700 Rivertech Court Riverdale, MD 20737

Remittance Express (REX): (866) 234-5681

h. On-Line Payment Option

https://www.pay.gov/public/home

Enter sfo 1.1 in the search field. Open and complete the form.

i. Additional payment guidance is available at:

https://www.epa.gov/financial/makepayment

or by contacting Craig Steffen at 513-487-2091

- Payment by Respondent shall reference Respondent's name and address, and the EPA Docket Number of this CAFO.
- 67. A copy of Respondent's check or a copy of Respondent's electronic fund transfer shall be sent simultaneously to:

T. Chris Minshall Senior Assistant Regional Counsel U.S. EPA, Region III (3RC30) 1650 Arch Street Philadelphia, PA 19103-2029

and

Regional Hearing Clerk U.S. EPA, Region III (3RC00) 1650 Arch Street Philadelphia, PA 19103-2029

68. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R. § 13.11, EPA is entitled to assess interest and late payment penalties on outstanding debts owed to the United States and a charge to cover the costs of processing and handling a delinquent claim, as more fully described below. Accordingly, Respondent's failure to make timely payment as specified herein shall result in the assessment of late payment charges including, interest, penalties and/or administrative costs of handling delinquent debts.

- 69. Interest on the civil penalty assessed in this CAFO will begin to accrue on the date that a true and correct copy of this CAFO is mailed or hand-delivered to Respondent. However, EPA will not seek to recover interest on any amount of the civil penalty that is paid within thirty (30) calendar days after the date on which such interest begins to accrue. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 40 C.F.R. § 13.11(a).
- 70. The costs of the Agency's administrative handling of overdue debts will be charged and assessed monthly throughout the period a debt is overdue. 40 C.F.R. § 13.11(b). Pursuant to Appendix 2 of EPA's Resources Management Directives Case Management, Chapter 9, EPA will assess a \$15.00 administrative handling charge for administrative costs on unpaid penalties for the first thirty (30) day period after the payment is due and additional \$15.00 for each subsequent thirty (30) days the penalty remains unpaid.
- 71. A late payment penalty of six percent per year will be assessed monthly on any portion of the civil penalty that remains delinquent more than ninety (90) calendar days. 40 C.F.R. § 13.11(c). The late payment penalty on any portion of the civil penalty that remains delinquent more than ninety days shall accrue from the first day payment is delinquent. 31 C.F.R. § 901.9(d).
- 72. Respondent agrees not to deduct for federal tax purposes the civil monetary penalty assessed in this CAFO.

V. CERTIFICATIONS

73. Respondent certifies to Complainant by its respective representative's signature hereto, to the best of its knowledge and belief, that Respondent and the Facility currently are in compliance with all relevant provisions of the federally-authorized PaHWMR, and of RCRA Subtitle C, 42 U.S.C. §§ 6921-6939g, for which violations are alleged in this CA.

VI. OTHER APPLICABLE LAWS

74. Nothing in this CAFO shall relieve Respondent of any duties otherwise imposed upon it by applicable federal, state, or local law and/or regulation.

VII. RESERVATION OF RIGHTS

75. This CAFO resolves only EPA's claims for civil penalties for the specific violations which are alleged in this CA. Nothing in this CAFO shall be construed as limiting the authority of EPA to undertake action against any person(s), including the Respondent, in response to any condition which EPA determines may present an imminent and substantial endangerment to the public health, public welfare or the environment. In addition, this settlement is subject to all limitations on the scope of resolution and to the reservation of rights set forth in Section 22.18(c) of the Consolidated Rules of Practice. Further, EPA reserves any rights and remedies available to it under RCRA, the

regulations promulgated thereunder, and any other federal laws or regulations for which EPA has jurisdiction, to enforce the provisions of this CAFO following its filing with the Regional Hearing Clerk.

VIII. FULL AND FINAL SATISFACTION

76. This settlement shall constitute full and final satisfaction of all civil claims for penalties which Complainant has under RCRA Section 3008(a) and (g), 42 U.S.C. § 6928(a) and (g), for the violations alleged in this CA. Compliance with the requirements and provisions of this CAFO shall not be a defense to any action commenced at any time for any other violation of the federal laws and/or regulations administered by EPA.

IX. PARTIES BOUND

77. This CA and the accompanying FO shall apply to and be binding upon the EPA, the Respondent, Respondent's officers and directors (in their official capacity) and Respondent's successors and assigns. By his or her signature below, the person signing this CA on behalf of the Respondent acknowledges that he or she is fully authorized to enter into this CA and to bind Respondent to the terms and conditions of this CA and the accompanying FO.

X. EFFECTIVE DATE

78. The effective date of this CAFO is the date on which the FO is filed with the Regional Hearing Clerk after signature by the Regional Administrator or his designee, the Regional Judicial Officer.

XI. ENTIRE AGREEMENT

79. This CAFO constitutes the entire agreement and understanding of the parties concerning settlement of the above-captioned action and there are no representations, warranties, covenants, terms or conditions agreed upon between the parties other than those expressed in this CAFO. For Respondent:

Date: 11/16/2017

By:

James Babula

Operations Manager Dial Corporation

Date: 11/13/17

By:

SENFOR UP, SUPPLY CHAIN NORTH AMERICA

LARS KUCKA Dial Corporation

Approved as to Form

JEP

For Complainant:

Date: 11/27/2017

By:

T. Chris Minshall

Senior Assistant Regional Counsel

U.S. Environmental Protection Agency, Region III

After reviewing the EPA Findings of Fact, Conclusions of Law and other pertinent matters, the Land and Chemicals Division of the United States Environmental Protection Agency, Region III, recommends that the Regional Administrator, or his designee, the Regional Judicial Officer, issue the attached Final Order.

Date: 12-11-2017

By:

Martha Shimkin, Acting Director Land and Chemicals Division

U.S. Environmental Protection Agency, Region III

RECEIVED

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 2017 DEC 20 AM 9: 06 REGION III

REGISSIAL HEARING CLESS

EPA REGION III. PHILA PA

In the Matter of:

Dial Corporation 125 Jaycee Drive West Hazleton, PA 18201 Docket No. RCRA-03-2018-0016

FINAL ORDER

Respondent

125 Jaycee Drive West Hazleton, PA 18201

Facility

Proceeding under RCRA Section 3008(a)(1) and (g), 42 U.S.C. § 6928(a)(1) and (g)

FINAL ORDER

Complainant, the Director of the Land and Chemicals Division, U.S. Environmental Protection Agency, Region III, and Respondent, Dial Corporation, have executed a document entitled "Consent Agreement," which I hereby ratify as a Consent Agreement in accordance with the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits ("Consolidated Rules of Practice"), 40 C.F.R. Part 22 (with specific reference to Sections 22.13(b) and 22.18(b)(2) and (3)). The terms of the foregoing Consent Agreement are accepted by the undersigned and incorporated into this Final Order as if fully set forth at length herein.

Based on the representations of the parties in the attached Consent Agreement, the penalty agreed to therein is based upon consideration of the statutory factors set forth in RCRA Section 3008(a)(3), 42 U.S.C. § 6928(a)(3) and EPA's RCRA Civil Penalty Policy (October 1990 and June 2003).

NOW, THEREFORE, PURSUANT TO Section 3008(a)(1) and (g) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6928(a)(1) and (g), and the Consolidated Rules of Practice, IT IS HEREBY ORDERED that Respondent pay a civil penalty of FORTY-FOUR THOUSAND FIVE HUNDRED AND NINETY-EIGHT **DOLLARS** (\$44,598.00), plus any applicable interest, as specified in the Consent Agreement, and comply with the terms and conditions of the Consent Agreement.

The effective date of the foregoing Consent Agreement and this Final Order is the date on which this Final Order is filed with the Regional Hearing Clerk.

Date: Dec. 19, 2017

Joseph J. Lisa

Regional Judicial Officer

U.S. Environmental Protection Agency, Region III

RECEIVED

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY DEC 20 AM 9: 06 REGION III

1650 Arch Street
Philadelphia, Pennsylvania 19103



In Re:

.

Dial Corporation

125 Jaycee Drive

West Hazleton, PA 18201

Docket No. RCRA-03-2018-0016

RESPONDENT.

:

Dial Corporation

125 Jaycee Drive

West Hazleton, PA 18201

Proceeding under Section 3008(a) and (g) of the Resource Conservation and

Recovery Act, as amended, 42 U.S.C.

Section 6928(a) and (g)

FACILITY.

CERTIFICATE OF SERVICE

I certify that I sent a copy of the Consent Agreement and Final Order in the above-captioned matter to the addressee in the manner listed below. The original and one copy of the Complaint were hand-delivered to the Regional Hearing Clerk, U.S. EPA Region III, 1650 Arch Street, Philadelphia, PA 19103-2029.

Via UPS, next day delivery to:

David A. Rockman Eckert Seamans Cherin & Mellott, LLC U.S. Steel Tower 600 Grant Street, 44th Floor Pittsburgh, PA 15219

Date: 12/20/17

T. Chris Minshall

Sr. Assistant Regional Counsel

U.S. Environmental Protection Agency, Region III

Matter involving claims by other Regions? Yes or No

4	CASE	AND	FACIL	ITV F	BACKGROUNI)

Regional Hearing Clerk Docket Number <u>RCRA-03-2018-0016</u>	
2. Respondent(s) or Defendant(s) (Enforcement Action) Name <u>Dial Corpe</u>	oration
3. Facility Name(s) Dial Corporation / Henkel Consumer Goods Inc.	
(a) RCRA Info (Subtitle C) programmatic ID:PAD987271012_ Do not complete fields mark with a *, if the Settlement Action Type is one of CAFO CAFO Consent Decree or Court Order Resolving a Civil Judicial Action Consent Decree or Court Order Resolving a Civil Judicial Action Enforceable Final Order Activity Producing Results Non-Lead Participants in Multi-Regional Case 4. Facility Address: (No P.O. Box) Street*: 125 Jaycee Drive City*: 1	Lodged Entered West Hazleton County*: Luzerne St*: PA Zip*: 18201
(a) Latitude*: 40.972585 Longitude*: -76 (b) Horizontal Collection Method*: Address matching-house number Reference Point*: Facility/Station Building entrance or street address (c) Federal Facility? * (Yes o No) if Yes, √ option(s) below:	Primary 6-Digit NAIC Code(s)*:325611
(d) Federal Facility Activity () No Federal Facility Involved (d) Federal Facility Activity Comment*:	vement () Non-Federal Party Impacting Federal Property
6. (a) EPA Lead Attorney C. Minshall (3RC30) (b) 7. Does this settlement involve the Next Generation Compliance Tool? If box is check, complete the Comment field below:	EPA Technical Contact R. Serfass (3LC32) Tyes, check the box. □
8. Enforcement Action Type — (section of statute that authorizes pursuit of X_ RCRA 3008A (AO for Compliance and/or Penalty - Hazardous Waste RCRA 3008H (AO for Corrective Action) RCRA 3013 (AO for Compliance) RCRA 7003 (AO for Imminent Hazard) RCRA 9012 AO for Delivery Prohibition - UST	penalty and/or injunctive relief) (select one):) RCRA 7003 (AO for Imminent Hazard) RCRA 9006 (AO for Compliance and/or Penalty - UST) RCRA 9006 UST-ACO or APO-Expedited Settlement Agreement RCRA 9006 UST -ACO or APO-Field Citation
9. Law(s), Section(s) and Subsection(s) violated (check all that apply): X RCRA 3002 (HW Standards for Generators) LQG RCRA 3002 (HW Standards for Generators) SQG RCRA 3002 (HW Standards for Generators) CESQG RCRA 3003 (HW Standards for Transporters) - Transporter Req. RCRA 3003 (HW Standards for Transporters) - Transfer Station RCRA 3004 (HW Standard for Treatment/Storage/Disposal) RCRA 3004VU (TSD Corrective Action) RCRA 3007 (HW Information Gathering) RCRA 9002 UST Notice ReqCorrective Action Petroleum RCRA 9002 UST Notice ReqRegulatory Hazardous Substance RCRA 9002 UST Notice ReqRegulatory Petroleum RCRA 9003 (UST Release Detection, Prevention, Correction Regulations) Corrective action hazardous substance RCRA 9003 (UST Release Detection, Prevention, Correction	RCRA 3008C (Violation of Compliance Order) RCRA 3008H (Interim Status Corrective Action Order) RCRA 3013 (Monitoring, Analysis, Testing) – Corrective actions RCRA 3013 (Monitoring, Analysis, Testing) – Generator RCRA 3013 (Monitoring, Analysis, Testing) – TSD facility RCRA 3013 (Monitoring, Analysis, Testing) – Transporter RCRA 3014 (Restrictions on Recycled Oil) RCRA 3017 (Export of Hazardous Waste) RCRA 9003 (UST Release Detection, Prevention, Correction Regulations) Regulatory Petroleum RCRA 9005 (UST Information Gathering) RCRA 9006(d)(2)(E) UST Delivery Prohibition - Regulatory Petrol. RCRA 7003 Imminent Order. Solid or HW- Corrective Action RCRA 7003 Imminent Order. Solid or HW- Order for HW RCRA 7003 Imminent Order. Solid or HW- Order for Solid Waste

Regulations) Corrective waste petroleum

Settlement Action Type and Date (select one):	
(a) 40 CFR Part 22 settlement:	(data alasked in with Dagianal Hearing Clark)
i Final Administrative Penalty Order	(date clocked in with Regional Hearing Clerk) 12/25//7 (date clocked in with Regional Hearing Clerk)
iiX SuperFAPO (under 40 CRF Sec. 22.13 (b) authority)	
(b)Administrative Orders or Administrative Compliance Orders	(date signed by DD or RA)
(c)Consent Decree or Court Order Resolving a Civil Judicial Action Lod	ged(date lodged by the Court)
(d)Consent Decree or Court Order Resolving a Civil Judicial Action Ent	ered(date filed/entered by the Court)
(e)Judicial Order Amending or Enforcing Consent Decree	(date filed/entered by the Court)
(f)Non-Lead Participant in Multi-Regional Case	(date filed/entered by the Court or RJO)
11. List names of all Respondent(s)/Defendant(s). List the names, if different, of sheets as necessary.	the facilities where the violation(s) occurred. Attach additional
Dial Corporation	
12. THIS SECTION NOT BEING UTILIZED.	
IMPORTANT: CASES ENFORCING EXPORT RELATED REQUIREMENTS	(TSCA 12, RCRA, ETC.) WHERE NO MATERIAL IS BEING STORED
OR HELD IN THE U.S. AND NOTICE OF DETERMINATIONS (NODS) ARE	EXEMPT FROM AN EJSCREEN ASSESSMENT.
and the second s	se a good initiation form? / Forward Matt Lee's
Was the EJSCREEN assessment performed previously by Matthew I	zee, e.g., case initiation form?
EJSCREEN narrative.	
A PROGRAMME V. J. V. V. V. V.	
13. EJSCREEN Flag National: Yes _X_No	
EJSCREEN Flag State: Yes _X_No	
Enhanced Review for Potential EJ Concerns:	
Enhanced Review – Potential EJ Concern Found	
Enhanced Review – Potential EJ Concern Not Found	
X No Enhanced Review	
Basis of EJ Determination (Select all that apply):	
Other basis (Pl	lease Explain)
	Government knowledge of community/location
EPA knowledge of community/location (including inspector obs	ervation)
Public Input	
State/Local/Tribal Government knowledge of community/location	on
Explanation of Basis:	p v
Explanation of Basis.	Control of the Contro
If EJ Assessment has not been conducted, OECEJ can provide this in	formation for you. Please contact Matthew Lee at 4-2917.
ii Ed Assessment has not been conducted, obells can provide and m	
AUDIT POLICY APPLIED? Yes or No, if Yes, Disclosure Date:	/
14. Was Alternative Dispute Resolution used in this action? Circle one: Yes / N	io
B. OECA CORE PROGRAM Circle one Yes No If "No", one of the priorit	ies below in blocks C or D must be "Yes"
C. NATIONAL ENFORCEMENT PRIORITY Circle one: Yes No If Yes, o	check option(s) below:
RCRA/Air - Basic Chem Mfg	_ RCRA/Air - Other
RCRA/Air - TSD	Energy Extraction (land-based gas extraction and production)
D. REGIONAL PRIORITY Circle one: Yes No If Yes, check option(s) below	w:
_ Chesapeake Bay Air Shed	_ Healthy Waters
Chesapeake Bay Watershed	_ Integrated Strategies
Direct Implementation	SDWA MCL Exceedance
Federal Facilities in Chesaneake Bay Watershed	

E. VIOLATION DESCRIPTION(s) (Check all that apply)	
X_ Container requirements	
X Labeling/marking requirements	
Discharge, emission or activity without required permit	
RCRA Treatment facility requirements	
Manifesting - no manifests of manifest errors	
RCRA Misidentified waste	
Handler notification	
Land disposal and treatment	
Export violation	
_ Import violation	
RCRA Permit evader	
Bevill enforcement case	
_ RCRA K061 Initiative	
Violation of financial responsibility requirements	
Violation of Information Request Letter requirements	
X Record keeping violations	
UST leak detection and repair	
UST Requirements, other than leak detection and repair	
_ Other/miscellaneous	
See https://usepa.sharepoint.com/sites/R3_Community/Managers/EnfComm, select FY2017 CCDS forms, and select Violat	ion Type Listing for
more choices, if needed	
F. POLLUTANT DESCRIPTION(s) (check all that apply)	
X 6614 Hazardous waste	
_ 7659 Petroleum product	
See https://usepa.sharepoint.com/sites/R3_Community/Managers/EnfComm, select FY2017 CCDS forms, and select Pollut	ant Listing for more
choices, if needed	
G. RELIEF SOUGHT: (✓ appropriate option(s)) _X Penalty injunctive H. CFR CITATION(s): 40 CFR 262.34 40 CFR 262.41 40 CFR 265.53 40 CFR 265.173 40 CFR 273.13 40	DENTIAL, lem(s), and a
the public. Forward electronic version of salient of weekly Activity Report (WAR) Rem.	
See Attachment	
	,
J. If this case meets the Big Case Projection definition, ✓□. To review the definition, please access OECI Case Development, then Big Case Projection Form.	EJ's intranet, select
K. PENALTY (if there is no penalty, enter 0)	
15. Cash Civil Penalty Amount Sought: \$_44,598.00	
16. Cash Civil Penalty Amount Required by Statute: \$ N/A	
Penalty Assessed to be Paid to:	
a) EPA: \$_44,598.00	
b) Is Another Federal Agency as co-plaintiff? (Yes or No), if yes, Name of other Federal Agency:	
Amount assessed by other Federal Agency: \$_N/A	
c) State/Local Agency: \$_N/A	
17. THIS SECTION NOT BEING UTILIZED	
III. THE OPERIOR HOLD CONTROL OF THE OPERIOR OF THE	*

M. INJUNCTIVE RELIEF/COMPLIANCE ACTIONS (Non-SEP)

19. What action did Respondent/Defendant take prior to receipt of settlement/order or will take to return to compliance or meet addl. requirements (other than what has already been reported on the Inspection Conclusion Data Sheet (ICDS))? The Region can take credit for pollutant reductions which result from the Agency's enforcement even though the action being reported on this form does not specifically require such reductions. Where

Select response(s) from the following:				
Removal and Restoration - Applies to cases in	which a pollution release has	already occurred and will require	e treatment/restor	ration, removal and/or
mitigation as part of clean-up efforts.				
		Quantitative Environmental	Impact	
(Check all that apply/add pollutant for each)	Pollutant	Amount	Unit	Impacted Media
_ In-situ Treatment	_ Haz Waste		_ Yards ³	_ Land
Ex-situ Treatment	_ Gasoline		Pounds	_ Soil
Removal of Contaminated Media	_ Used Oil			
Removal of Released Pollutants	_ Contam. Soil			
			·	eliminatas an on
Reduction of On-going Releases - Applies to	cases that produce environment	al benefits from a complying act	ion that reduces	or eliminates an on-
going discharge, emission, or release of polluta	ints to the environment.			
		Quantitative Environmental	Impact	
(Check all that apply/add pollutant for each	Pollutant	Annual Amount	Unit	Impacted Media
_ Disposal Change (non-HW)	_ Haz Waste		_ Yards ³	_ Land
_ HW Disposal Change	_ Gasoline		_ Pounds	_ Soil
_ HW Storage Change	_ Used Oil		_ Gallons	
_ HW Treatment	Other:			
_ HW Use Reduction				
_ HW Waste Containment				
_ Storage Change (non-HW)				
_ Treatment (non-HW)				
_ Use Reduction (non-HW)				
_ UST Tank Removal				
_ UST Tank Repair				
_ UST Tank Storage Change				
_ Waste Containment (non-HW)				
(Check all that apply/add pollutant for each Proper Waste Containment Proper Waste Disposal Proper Waste Export Proper Waste Storage Proper Waste Treatment UST Implementation of CP UST Implementation of RD UST Implementation of Spill/overfill	Pollutant x Haz Waste Gasoline Used Oil Other:	Quantitative Environmental Annual Amount 2,800	Unit _ Yards ³ x Pounds _ Gallons	Impacted Media x Land Soil
_ UST Secondary Containment				
_ UST Tank Closure				
Work Practices (check all that apply) Financial Responsibility Requirements HW Identification Institutional Controls	x Labeling-Identification Manifesting Monitoring	x Record Keeping x Reporting Testing/Sampling	<u>_x</u> Wo	rk Practices
Information Letter Response	Notification	_ Training		
_ mornanon better response				
(No Quantitative Environmental Impact requir				
PRIORITY: If applicable, indicate the prio below:	rity and allocate the cost of Co	omplying Action/Inj. Relief to	appropriate pri	ority (ies) listed
OECA CORE PROGRAM:		\$7,500		
NATIONAL PRIORITY/AMOUNT:		s		
REGIONAL PRIORITY/AMOUNT:		\$Var(Ne	IEVaa ahaali sad	tion(s) below
N. SUPPLEMENTAL ENVIRONMENTAL	L PROJECT (SEP) INFORM	ATION Circle one: Yes / No	ii Yes, check opt	non(s) below:

separate penalty and/or compliance orders are issued regarding same violation(s), report the following information for only one of those orders.

0 Categorie	s of SEP(s) (Chec	ck all appropriate	categories)			Cost (Project Model	
io. cuitgoni	201021(1)(calculation cost is preferred)	
	_ (a) Publ	ic Health					
	(b) Polli	ution Prevention (Complete Q. 23)				
	_	_(1) equipment/te	echnology modificat	tions			
	_	(2) process/proc	cedure modification				
	_	(3) product refo	ormulation/redesign				
	_	_ (4) raw material	ls substitution				
	_	_ (5) improved ho	ousekeeping/O&M/t	raining/invent	ory-control	, -	
	_	(6) in-process re	ecycling				
	-	(7) energy effic	eiency/conservation				
	_ (c) Poll	ution Reduction (Complete Q. 23)				
	_ (d) Env	ironmental Restor	ration and Protection	1			
		essments and Audi				*	
		ironmental Compl					
	(g) Eme	ergency Planning a	and Preparedness				
	(h) Oth	er Program SEP ca	ategory (specify)				_
21. SEP desc	ription						
	5 64						
22. Is Enviro	nmental Justice a	nddressed by impa	act of SEP? Circle of	one: Yes /No)		
23. SEP Quar	ntitative environn	nental pollutants a				eductions/eliminations (e.g.,	
23. SEP Quar emissions/dis	ntitative environn scharges). Please	mental pollutants a circle the applicab	and/or chemicals and ble media and units.	d/or waste-stream			
23. SEP Quar emissions/dis	ntitative environn	mental pollutants a circle the applicab	and/or chemicals and	i/or waste-strea		eductions/eliminations (e.g., Potentially Impacted Media Land	
23. SEP Quar emissions/dis	ntitative environn scharges). Please	mental pollutants a circle the applicab	and/or chemicals and ble media and units.	d/or waste-strea	ams, amount of r	Potentially Impacted Media	24 3 24 3 1 27
23. SEP Quar emissions/dis	ntitative environn scharges). Please	mental pollutants a circle the applicab	and/or chemicals and ole media and units. Annual Amount	Units Pounds Pounds/year	ams, amount of r	Potentially Impacted Media Land	
23. SEP Quar emissions/dis	ntitative environn scharges). Please of llutant/Chemical	nental pollutants a circle the applicab I/Waste Stream	and/or chemicals and ble media and units.	Units Pounds Pounds/year Gallons/year	ams, amount of r	Potentially Impacted Media Land Ground water	
23. SEP Quar emissions/dis	ntitative environn scharges). Please o	nental pollutants a circle the applicab	and/or chemicals and ole media and units. Annual Amount	Units Pounds Pounds/year Gallons/year People	ams, amount of r	Potentially Impacted Media Land Ground water Surface water	
23. SEP Quar emissions/dis	ntitative environn scharges). Please of llutant/Chemical	nental pollutants a circle the applicab	and/or chemicals and ole media and units. Annual Amount	Units Pounds Pounds/year Gallons/year People Acres	ams, amount of r	Potentially Impacted Media Land Ground water Surface water Wetlands	
23. SEP Quar emissions/dis	ntitative environn scharges). Please o	nental pollutants a circle the applicab	and/or chemicals and ole media and units. Annual Amount	Units Pounds Pounds/year Gallons/year People Acres Linear feet (ams, amount of r	Potentially Impacted Media Land Ground water Surface water Wetlands Wastewater to POTW Air	
23. SEP Quar emissions/dis	ntitative environn scharges). Please o	nental pollutants a circle the applicab	and/or chemicals and ole media and units. Annual Amount	Units Pounds Pounds/year Gallons/year People Acres Linear feet (Linear feet (ams, amount of r	Potentially Impacted Media Land Ground water Surface water Wetlands Wastewater to POTW Air Animals/Plants/Humans	
23. SEP Quar emissions/dis	ntitative environn scharges). Please o	nental pollutants a circle the applicab	and/or chemicals and ole media and units. Annual Amount	Units Pounds Pounds/year Gallons/year People Acres Linear feet (Linear feet (ams, amount of r	Potentially Impacted Media Land Ground water Surface water Wetlands Wastewater to POTW Air	
23. SEP Quaremissions/dis	ntitative environn scharges). Please o	nental pollutants a circle the applicab	and/or chemicals and ole media and units. Annual Amount	Units Pounds Pounds/year Gallons/year People Acres Linear feet (Linear feed (small stream) medium stream) (large stream)	Potentially Impacted Media Land Ground water Surface water Wetlands Wastewater to POTW Air Animals/Plants/Humans Buildings/Houses/Schools	
23. SEP Quaremissions/dis	ntitative environn scharges). Please o	nental pollutants a circle the applicab	and/or chemicals and ole media and units. Annual Amount	Units Pounds Pounds/year Gallons/year People Acres Linear feet (Linear feed (small stream) medium stream) (large stream)	Potentially Impacted Media Land Ground water Surface water Wetlands Wastewater to POTW Air Animals/Plants/Humans	
23. SEP Quaremissions/dis	ntitative environn scharges). Please o	nental pollutants a circle the applicab	Annual Amount BEING UTILIZE	Units Pounds Pounds/year Gallons/year People Acres Linear feet (Linear feed (small stream) medium stream) (large stream) USE THE GE	Potentially Impacted Media Land Ground water Surface water Wetlands Wastewater to POTW Air Animals/Plants/Humans Buildings/Houses/Schools	
23. SEP Quaremissions/dis	ntitative environmecharges). Please of the second section of the section of the second section of the section of the second section of the s	nental pollutants a circle the applicab	Annual Amount BEING UTILIZE CO	Units Pounds Pounds/year Gallons/year People Acres Linear feet (Linear feed (ED; PLEASE	small stream) medium stream) (large stream) USE THE GE	Potentially Impacted Media Land Ground water Surface water Wetlands Wastewater to POTW Air Animals/Plants/Humans Buildings/Houses/Schools	
23. SEP Quaremissions/dis	ntitative environm scharges). Please of llutant/Chemical	nental pollutants a circle the applicab //Waste Stream SECTION NOT	Annual Amount BEING UTILIZE CC 3LC32 3	Units Pounds Pounds/year Gallons/year People Acres Linear feet (Linear feed (ED; PLEASE DNCURRENC BLC30	small stream) medium stream) (large stream) USE THE GE	Potentially Impacted Media Land Ground water Surface water Wetlands Wastewater to POTW Air Animals/Plants/Humans Buildings/Houses/Schools NERIC CCDS FORM).	
23. SEP Quaremissions/dis	ntitative environmecharges). Please of the second section of the section of the second section of the section of the second section of the s	nental pollutants a circle the applicab	Annual Amount BEING UTILIZE CC 3LC32 3	Units Pounds Pounds/year Gallons/year People Acres Linear feet (Linear	small stream) medium stream) (large stream) USE THE GE	Potentially Impacted Media Land Ground water Surface water Wetlands Wastewater to POTW Air Animals/Plants/Humans Buildings/Houses/Schools NERIC CCDS FORM).	
23. SEP Quaremissions/dis	ntitative environm scharges). Please of llutant/Chemical	nental pollutants a circle the applicab //Waste Stream SECTION NOT	Annual Amount BEING UTILIZE CC 3LC32 3	Units Pounds Pounds/year Gallons/year People Acres Linear feet (Linear feed (ED; PLEASE DNCURRENC BLC30	small stream) medium stream) (large stream) USE THE GE	Potentially Impacted Media Land Ground water Surface water Wetlands Wastewater to POTW Air Animals/Plants/Humans Buildings/Houses/Schools NERIC CCDS FORM).	

ORC and Program staff need to fill in and sign off on concurrence chain before package is placed into concurrence.

EPA Enters into CAFO with Dial Corporation for RCRA Violations [Docket No. RCRA-03-2018-0016] On December 20, 2017, Region III filed a Consent Agreement and Final Order ("CAFO") for violations of Pennsylvania's Hazardous Waste Management Regulations, which Pennsylvania administers in lieu of the federal hazardous waste management program established by RCRA Subtitle C. Dial Corporation manufactures antibacterial soap and laundry detergent at its facility in West Hazleton, Pennsylvania, and as a generator of hazardous waste, it is required to comply with the federally authorized Pennsylvania Hazardous Waste Management Regulations, which are designed to protect human health and the environment by providing for the safe management of hazardous waste. As the result of a Compliance Evaluation Inspection and subsequent communications, EPA discovered that Dial Corporation had been operating a hazardous waste treatment, storage and/or disposal facility without a permit or interim status, and had failed to: keep hazardous waste containers closed, submit copies of the contingency plan to local authorities, file biennial reports, store universal waste lamps in closed structurally sound containers, label universal waste lamp containers and identify the accumulation start date for universal waste batteries. Under the CAFO, Dial Corporation has agreed to fully comply with hazardous waste management requirements and pay a civil penalty of \$44,598.00. ORC Attorney: Chris Minshall (215) 814-2473, Additional Contact: Rebecca Serfass (215) 814-2047.